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STATE AIR POLLUTION IMPLEMENTATION PLAN

Environmental Protection Agency
Research Triangle Park, North Carolina

September 1974

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16. ABSTRACT

Plans for attainment of national ambient air quality standards have been submitted by all States. This report describes progress toward implementing those plans from January to June 1974. Since the last progress report, the number of fully approved State Implementation Plans (SIPs), with no regulatory disapprovals, has dropped form 16 to 3. This is due to the Environmental Protection Agency's promulgation for the review of indirect sources. Of the 52 plans still having deficiencies, 38 have only regulatory deficiencies, which have been corrected by EPA promulgation, and 14 are being finalized by State or EPA action. The adequacy of air monitoring networks and air quality data reporting is reviewed; despite real improvements, problem areas still remain. The status of EPA enforcement activities is discussed. Compliance schedules have been developed for most major point source facilities, and these schedules are being monitored and enforced. The Plan Revision Management System, which identifies "possible deficiencies" in the attainment of air quality standards, has been expanded to cover 117 Air Quality Control Regions, representing approximately 79 percent of the nation's population. Possible deficiencies identified are being investigated by the Regional Offices. States have identified areas with the potential of exceeding any national standard within the next 10 years, and Air Quality Maintenance Areas have been established for most such areas. National issues affecting the SIPs are discussed. Prominent among these is the energy issue.

17. KEY WORDS AND DOCUMENT ANALYSIS

a. DESCRIPTORS	b. IDENTIFIERS/OPEN ENDED TERMS	c. COSATI Field/Group
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and

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FOREWORD

This is the third in a continuing series of reports assessing the progress made by States in implementing the Clean Air Act. It covers the period January 1 through June 30, 1974. In some instances, where applicable, more recent information is provided.

State plans are designed to provide for the control of pollution from mobile sources (through transportation control plans) as well as stationary sources. At the present time, most States are operating with approved implementation plans. In some States, the Environmental Protection Agency has promulgated portions of plans to correct deficiencies. States are working to clean up deficiencies and to design programs to handle the maintenance-of-standards problem.

Over the past 6 months progress has been made; and in many areas of the country the air is cleaner. State and Federal efforts have resulted in the identification and investigation of approximately 16,000 (80 percent) of the country's major emitters, of which over 12,000 are now in compliance or on compliance schedules. A major effort is under way to assure that compliance schedules are established where needed and adhered to. Increased attention is also being given to assuring that, once compliance is achieved, it is continued.

Despite this progress, it is becoming evident that in some large urban centers, achievement of health-related ambient air quality standards for particulate matter and sulfur oxides (produced largely by the combustion of fossil fuels) will be delayed beyond the attainment dates set by the Clean Air Act. The principal causes of this delay are a combination of inadequate enforcement efforts, unavailability of low-sulfur fuels, delays in the installation of flue-gas desulfurization equipment, and inadequacies in implementation plans. Special efforts are under way to increase Federal, State, and local enforcement and to determine the extent to which problems in implementation plans can be remedied. The results of these efforts will serve to further focus activities in EPA's air pollution program during the coming year. Other problems involve the implementation of transportation control plans and meeting oxidant and carbon monoxide standards in all areas by 1977.

Another significant problem is the growing gap between the level of resources required to implement State plans and the level which States have. The lack of adequate numbers of trained air pollution control staffs is detracting from the ability of States to perform a wide variety of tasks required under the Clean Air Act, including the provision of air quality and emission data to EPA on a timely basis.

In general, significant progress is being made toward the attainment of clean air, despite some problem areas mentioned above in certain urban areas.

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ACKNOWLEDGMENTS

The preparation of this report resulted from information provided by the State and local air pollution control agencies, the Environmental Protection Agency Regional Offices, and various EPA Headquarters groups.

As with earlier reports relating to State Implementation Plan progress, this edition continues to be a joint effort between the Division of Stationary Source Enforcement, Office of Enforcement and General Coursel, and the Office of Air Quality Planning and Standards, Office of Air and Waste Management.

Information on enforcement activities was provided by the Division of Staticnary Source Enforcement, Office of Enforcement and General Coursel. Additional specific information on EPA air programs can be obtained by contacting the EPA Regional Offices.

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ABBREVIATIONS AND SYMBOLS

AQCRs	Air Quality Control Regions
AQMAs	Air Quality Maintenance Areas
AQMPs	Air Quality Maintenance Plans
CDS	Compliance Data System
CFP	Clean Fuels Policy
CY	calendar year
DOT	Department of Transportation
EPA	(U.S.) Environmental Protection Agency
FEA	Federal Energy Administration
FGD	flue gas desulfurization
FY	fiscal year
HC	hydrocarbons
NAAQS	National Ambient Air Quality Standards
NADB	National Aerometric Data Bank
NESHAPS	National Emission Standards for Hazardous Air Pollutant Substances
NO_2	nitrogen dioxide
NSPS	New Source Performance Standard
OAQPS	Office of Air Quality Planning and Standards
O_x	oxidant
ppm	parts per million
PRMS	Plan Revision Management System
PVC	polyvinyl chloride
SAROAD	Storage and Retrieval of Aerometric Data
SCS	supplementary control system
SIP	State Implementation Plan
SO_2	sulfur dioxide
TSP	total suspended particulate
VCM	vinyl chloride monomer

STATE AIR POLLUTION IMPLEMENTATION PLAN PROGRESS REPORT, JANUARY 1 TO JUNE 30, 1974

SECTION 1 - EXECUTIVE SUMMARY

STATE IMPLEMENTATION PLANS (SIPs), OVERVIEW

Since the last SIP progress report,[1] the number of fully approved SIPs, with no regulatory disapprovals, has dropped from 16 to 3. This is due to the Environmental Protection Agency's promulgation for the review of indirect sources. Only the Florida, Alabama, and Guam plans are fully approved.

Of the 52 plans still having deficiencies, 38 have only regulatory deficiencies, which have been corrected by EPA promulgation; and 14 are in the stages of finalization by State or EPA action.

DATA REPORTING

The reporting of data from the States to the Environmental Protection Agency is a particularly vital part of the overall process. Both air quality data and emissions data are needed to measure progress, identify problem areas and evaluate strategies. The requirements for reporting are contained in 40 CFR 51.7.[2] However, many States are not meeting these minimum requirements.

Progress has been made in achieving timely reporting of air quality data. At the conclusion of the second quarter of calendar year 1974, data reaching SAROAD represented a 34 percent increase in the number of sites reporting at least one valid quarter of data over CY 1972 data in by September 1973. This increase is due to more monitoring sites coming into operation and to more efficient operation of the quarterly reporting mechanism. The increase means that more data are becoming available in less time.

Despite these real improvements, problem areas still remain. Many sites have still not reported four valid quarters of data for CY 1973. Hence, it is not possible to characterize annual air quality trends in all areas. In addition, the number of oxidant sites reporting one valid quarter of data is still below both the Federal minimum and the SIP requirement.

In contrast to the progress made in air quality reporting, the reporting of emissions data is an area of real concern. Although the National Emissions Data System (NEDS) is now completely operational, the small amount of data reported is a serious problem. For the semiannual reporting period ending December 31, 1973, reports were received from only 14 of 51 States required. This number represents a serious decline since the previous two semiannual reports.

In recognition of the reporting problem, the Office of Air Quality Planning and Standards (OAQPS) is developing a computer software package (near completion) that, when implemented at the State level, will help to improve reporting and will provide for the States' own data needs. Monitoring and data reporting was identified as one of three major priorities for fiscal year (FY) 1975, and OAQPS will work to improve the reporting system.

CONTROL AGENCY RESOURCES

Control agency resources are being strained by the increased program demands being placed upon them. New programs, such as the development of Air Quality Maintenance Plans and implementation of the Nonsignificant Deterioration regulations, are costly, both in terms of staff effort and in money for contract support. In addition, some air pollution control activities must, in part, be carried out by other governmental agencies (e.g., planning commissions, transportation departments, etc.). At present, the control agencies are approximately 3000 man-years below the estimate of needed resources. While the level of available resources has been increasing over recent years, program needs appear to be increasing at a greater rate. Since most of the new programs represent Federal requirements, it is of some concern that Federal financial assistance has remained constant.

MAINTENANCE OF STANDARDS

On July 10 and August 12, 1974, Air Quality Maintenance Area (AQMA) designations were proposed for all areas in the United States.[3,4] Table 1-1 shows a summary of proposed AQMA designations.

Table 1-1. SUMMARY OF PROPOSED AQMA DESIGNATIONS

AQMA designated by	Number of States	Number of AQMAs	Pollutant				
			TSP	SO_2	CO	O_x	NO_2
State	21	100	95	30	18	24	4
EPA	20	88	72	26	6	30	5
Total	41	188	167	56	24	54	9

INDIRECT SOURCE REVIEW

Three States (Alabama, Florida, and Guam) have approved indirect source review procedures. For all other States, EPA has promulgated (February 25, 1974, as revised on July 9, 1974)[5,6] Federal regulations for indirect source review effective January 1, 1975. Several States have submitted indirect source review plans that are expected to be approved shortly. A number of other States and local agencies have indicated interest in being delegated the responsibility of carrying out EPA's indirect source regulations. Publication of these delegations is expected shortly. (Eight States lack legal authority.)

EXTENSION FOR DEVELOPMENT TO MEET SECONDARY STANDARDS

EPA has granted or provided 18-month extensions for the development of control strategies for achieving secondary standards for particulate matter and/or sulfur dioxide in 19 States involving 30 Air Quality Control Regions (AQCRs). Of these, 8 AQCRs involve sulfur dioxide, 14 involve particulates, and 8 involve both. Three plans for sulfur dioxide and 7 for particulate matter have been submitted by the States. The control plan for the Metro Baltimore AQCR in Maryland, the State of Hawaii, and the particulate plan in the State Capital AQCR for Virginia have been approved. The rest are under development either by EPA or the States.

SMELTERS

EPA is nearing completion of the development of regulations controlling sulfur dioxide from nonferrous smelters located in Arizona, New Mexico, Texas, Idaho, Montana, Utah, and Nevada. These regulations are designed to attain both primary and secondary ambient air quality standards with the exception of New Mexico and Nevada where, due to an approved State Regulation, the regulations are only designed to attain secondary standards. It is anticipated that the regulations, which, in most cases, will require the application and use of reasonably available control technology and a supplementary control system, will be proposed in the Federal Register in the near future.

In addition to the States above, EPA has called for a plan revision with respect to the smelter in El Paso, Texas. The State is working on this revision and is expected to submit revised regulations sometime this fall.

Efforts are continuing to encourage the affected States to submit approvable plans. However, EPA promulgation will probably be necessary. States may submit plans after the EPA promulgations, so that EPA regulations could be withdrawn. These actions will satisfy the requirement for developing a plan for meeting the secondary sulfur dioxide standard in these States. Fourteen smelters in the seven States are involved.

CHANGES TO 40 CFR PART 51

Regulations for preparation, adoption, and submittal of SIPs (40 CFR Part 51)[7] are being amended to conform with the decisions by the First, Second, and Eighth Circuit Courts as reported in the last report.[1] A

major result of the decisions is that SIP regulations and legal authority do not permit deferring compliance beyond the date specified in the SIP for attainment of air quality standards unless procedures of Section 110(f) of the Clean Air Act[8] are met.

PLAN REVISION MANAGEMENT SYSTEM (PRMS) - RESULTS OF ANALYSIS

The PRMS has now been used to analyze a total of 117 AQCRs, which contain approximately 79 percent of the nation's population. The current analysis identified only 15 percent of the total suspended particulate monitoring sites as having possible problems in attaining national ambient air quality standards by mid-1975. However, this small percentage of sites was distributed among 102 of the 117 AQCRs analyzed. The possible problem in most of these AQCRs was localized, but in some cases it appeared to be a more general problem. Only 1 percent of the sulfur dioxide sites showed potential problems in attaining national ambient air quality standards by mid-1975. The problems were generally located around large point sources such as smelters and power plants. Approximately 18 percent of the carbon monoxide sites and 38 percent of the oxidant sites appeared to have problems. Because of the complex nature of these two pollutants and the problems of sampling and analyzing them, site visits are required to further define the real nature of the problem.

SOURCE COMPLIANCE ACTIVITIES

During the semiannual period covered by this report, States and EPA have continued active enforcement programs. The priority placed by EPA on obtaining compliance by 18,000 to 20,000 major emitters (installations capable of emitting more than 100 tons per year of a pollutant; as a class, responsible for about 85 percent of the pollution emitted from all installations) has shown success. At the time of the last report, approximately 12,000 of these facilities had been investigated. By July 1974, the number of these facilities identified and investigated by States and/or EPA had risen to nearly 16,500. The number of these facilities in compliance with the SIP emission standards has increased from about 7600 in December of 1973 to 10,400 at the present time, while the number of major emitters on compliance schedules has risen from 1200 to over 2000. Of

the remaining 3800 major emitters investigated to date, some 1500 have State compliance schedules now being reviewed by EPA for approval. The compliance status of an additional 1500 is being reevaluated, and for the remainder, State and/or Federal action is pending.

Enforcement activity by EPA over the past 6 months has also increased markedly, as the attainment dates in many SIPs draw nearer. From the date the SIPs were approved until last December, EPA had made 1800 investigations of source compliance status (approximately 1100 formal inquiries citing the authority of Section 114[8] and approximately 700 site inspections and/or source tests). In the past 6 months, an additional 6000 Section 114 letters have been sent and 600 inspections and tests have been performed. These increased compliance investigations have resulted in a large increase in enforcement actions since December 31, 1973. At the present time, EPA has issued notices of violation to 230 facilities, up from 82 last December, and issued enforcement orders or initiated civil or criminal action at 47 installations, up from 24 in December 1973. This increased enforcement activity has served to stimulate State enforcement efforts in many areas, and a large number of notices of violation issued by EPA will be followed up by State enforcement actions (detailed in Table 5-3).

Compliance monitoring programs have been initiated in States and by EPA Regional Offices to assure that all major emitters in compliance are checked periodically by either the State or EPA and to provide for the verification of all increments of progress when they come due for all major emitters on compliance schedules. In addition, the EPA Regional Offices will verify the compliance status of about 10 percent of all major emitters handled by each State in order to verify the reliability of State data. Barring discovery of serious compliance problems in State programs by EPA's compliance monitoring effort, over 85 percent of all major emitters will achieve final compliance by July 1975. Although this will significantly reduce air pollution emissions, it is anticipated that air quality levels in many areas may not meet the health-related levels by the attainment dates, since some of the largest polluters will be among the remaining 15 percent violating emission standards. Special EPA program efforts

are in various stages of execution to assure that the largest emitters (including power plants, steel mills and industrial boilers) achieve compliance as expeditiously as possible.

REFEPENCES FOR SECTION 1

1. State Air Pollution Implementation Plan Progress Report, June 30 to December 31, 1973. U.S. Environmental Protection Agency, Research Triangle Park, North Carolina. EPA-450/2-74-004, April 1974.

2. Federal Register. Volume 38, No. 149. August 3, 1974. p. 20835.

3. Federal Register. Volume 39, No. 133. July 10, 1974. p. 25330.

4. Federal Register. Volume 39. August 12, 1974. p. 28906.

5. Federal Register. Volume 39, No. 38. February 25, 1974. p. 7269.

6. Federal Register. Volume 39, No. 132. July 9, 1974. p. 25291.

7. 40 CFR Part 51 - Requirement for Preparation, Adoption, and Submittal of Implementation Plans.

8. Clean Air Act Amendments of 1970. Public Law 91 604. December 31, 1970.

SECTION 2 - NATIONAL ISSUES

I. THE ENERGY SUPPLY AND ENVIRONMENTAL COORDINATION ACT OF 1974 (ESECA)[1]

The purposes of this Act, signed into law on June 22, 1974, are (1) to provide for a means to assist in meeting the essential needs of the United States for fuels, in a manner that is consistent, to the fullest extent practicable, with existing national commitments to protect and improve the environment; and (2) to provide requirements for reports respecting energy resources. The major thrust of the Act, relevant to stationary sources, is to increase the use of coal to conserve oil. The Federal Energy Administration (FEA) must prohibit power plants from using oil or natural gas as a primary fuel wherever such prohibition is practicable and may issue similar prohibition orders to other major fuel burners. These orders, however, are not effective until the date, specified by EPA, as the earliest date by which affected plants can meet applicable air pollution requirements while burning coal. The air pollution requirements, except if a severe oil or low sulfur coal shortage should occur this winter, range from protection of primary national ambient air quality standards to full compliance with SIP requirements. As mentioned, these conditions must be met before the plant can burn coal. With few exceptions, all temporary in nature, all such plants must comply with the applicable SIP requirements by January 1, 1980. The Act requires EPA to review all SIPs with respect to requirements applicable to stationary fuel burners and suppliers and to suggest plan revisions to States wherever such revisions would not interfere with the attainment/maintenance of any national ambient air quality standard and would be consistent with the purposes of both this Act and the Clean Air Act.[2] This requirement, by the legislative history of the Act, is intended to permit a mechanism by which EPA's clean fuels policy can be implemented to the extent that States agree to do so and by which conversions to the burn-

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ing of coal can be effected more readily, consistent with requirements of the Clean Air Act.[2] ESECA also states that an FEA prohibition order will not be effective for any period for which EPA certifies that the emissions from the source will cause or materially contribute to a significant risk to public health as a result of pollutants for which national ambient air quality standards have not been promulgated.

It is too early to define the impact this new legislation will have on SIPs and the enforcement of the requirements in such plans. It is clear, however, that the Act places major responsibilities on EPA as well as on FEA. The details of these responsibilities are too lengthy to delineate here, but they include the development of technical, administrative, and legal guidelines, decisions on a source-by-source basis, and the involvement of States, EPA Regional Offices, and EPA Headquarters Offices. Some of the major requirements are listed below as examples. Work is already underway pertinent to these and other requirements.

1. There must be an adequate exchange of information and discussion of policy with FEA.
2. The air pollution requirements, and the dates by which they can be met, must be determined for each source prohibited from burning oil or gas.
3. The "significant risk" criterion must be defined and applied to sources converting to coal.
4. Required reports must be prepared for submittal to Congress by late 1974.
5. All SIPs must be reviewed, and suggestions for revisions must be transmitted to the States.
6. Regulations setting forth procedures and requirements applicable to sources affected by the new legislation must be proposed and promulgated.

Item 5, as mentioned, is an extension of EPA's Clean Fuels Policy (CFP), which was reported on in the last progress report.[3] To date, the implementation of this policy has been concentrated on power plants in EPA Regions III, IV, and V, in which 80 percent of the nation's utility coal is consumed. Through air quality modeling of some 200 power plants, the impacts of these plants' emissions on ambient pollutant concentrations

have been predicted. Wherever a State's emission-limiting regulation appeared to be more stringent than might be needed to achieve the national ambient air quality standards, consideration of plan revision has been suggested. Such revisions relieve regulatory demand for additional emission controls on plants whose emissions are not causing nor contributing to contravention of the national ambient air quality standards. Thus, the coal burned in such plants complies with the adjusted SIP requirement, becoming, in the parlance of the Clean Fuels Policy, SIP-acceptable. EPA's estimate of the total number of tons of coal that will become SIP-acceptable through such plan revisions is referred to as the CFP potential. Table 2-1 shows the current status of anticipated regulation changes.

Table 2-1. STATUS OF REGULATION CHANGES (PLAN REVISIONS)

State	Projected 1975 coal usage, 10^6 tons/yr	Projected 1975 CFP potential, 10^6 tons/yr	Plan revision submitted	Plan revision approved
Ohio[a]	55.3	22.9	5/74	Uncertain
Indiana	29.4	16.8	10/74[b]	1/75[b]
Michigan	28.6	13.8	12/73	9/74[b]
Tennessee	21.6	11.8	10/73	7/74[b]
Alabama	20.9	13.5	10/73	7/74[b]
Georgia	17.9	12.6	7/74[b]	10/74[b]
Total	173.7	91.4		

[a]The Ohio plan revision submitted in April 1974 does not include the relaxed regulations that will be forthcoming after completion of adjudicatory hearings.

[b]Expected date.

II. UNLEADED AND LOW-LEAD GASOLINE

Achievement of carbon monoxide and oxidant standards in many Air Quality Control Regions is partially dependent on lowered automobile emission levels. The majority of domestic and foreign auto makers have chosen to use catalytic converters in 1975 model cars to reduce auto emissions. The presence of lead or phosphorus in gasoline will "poison" the catalysts and cause emission levels to exceed the Federal Standards. EPA regulations required that unleaded gas be generally available by July 1, 1974.[4] An EPA review of the situation[5] indicates that there should be no major problems related to general availability of unleaded fuel. In particular, EPA has determined that:

1. Essentially all large and many small refiners will produce unleaded gasoline.
2. The distribution system is generally prepared to supply unleaded fuel.
3. Independent marketers will receive this fuel from their current suppliers, or from an FEA-designated supplier.

In addition to requiring the availability of lead-free gasoline, EPA has also issued regulations requiring a 60 to 65 percent reduction in the lead content of leaded gasoline by 1979.[6] Lead emissions from leaded gas constitute a risk to human health, and this regulation is designed to reduce that risk.

These regulations will have several impacts. There will be a net energy savings associated with these regulations. An EPA sponsored analysis by Arthur D. Little, Inc., showed that the energy penalty incurred by refiners in producing lead-free and low-lead gasoline is more than outweighed by the increase in fuel economy that results from the use of the catalytic converter (see Table 2-2).[7] In addition, the individual motorist can expect net savings of approximately $48 over the lifetime of a new car (the savings due to increased spark plug and exhaust system life minus increased automobile production costs).

Table 2-2. ENERGY IMPACT OF EPA'S LEAD REGULATIONS AND EMISSION STANDARDS

(thousand of barrels per day)

	1975	1977	1979
Refinery energy requirements[a] (Base case, no lead regulations)	13,890	15,246	16,823
Gasoline production penalty			
Lead-free	6	13	34
Lead phase-down	0	27	75
Lead additive production (savings)[b]	(2)	(6)	(10)
Fuel economy (savings)[c]	(45)	(119 to 126)	(140 to 163)
Net energy penalty (savings)	(41)	(85 to 92)	(41 to 64)

[a]The energy impact of producing lead-free and low-lead gasoline was calculated by Arthur D. Little, Incorporated,[7] for EPA. This impact reflects all changes in the refining energy balance, including not only crude oil, natural gasoline, purchased refinery fuel, and butane inputs, but also purchased power and liquid propane gas production. The impact of the lead regulations is relative low primarily because the average octane rating of gasoline will decrease as new low-compression engines replace older engines demanding a high-octane gasoline.

[b]The energy savings resulting from the decreased production of lead additives were calculated by EPA based on an estimate that 56,700 Btu/lb of lead is required for the production of lead additives. The energy expended for the production of lead additive now used is 2.5×10^{13} Btu/yr (equivalent to 10,900 barrels of fuel oil per day) and would be approximately 3.2×10^{13} Btu/yr in 1980, assuming a 4 percent per year growth in gasoline production (to match the basis for the gasoline production penalty).

[c]The fuel savings resulting from the catalyst were calculated by EPA staff. It was assumed that 1975/76 model year cars meeting 1975 interim standards of 1.5 gpm HC, 15 gpm CO, and 3.1 gpm NO_x would achieve an 8 percent improvement in fuel economy over 1973/74 vehicles, and 1977-80 model year vehicles (1) meeting statutory standards would achieve a 4 percent improvement over 1973/74 vehicles, or (2) meeting interim standards of 0.41 gpm HC, 3.4 gpm CO, and 2.0 NO_x would achieve a 5 percent improvement. Fuel savings are expressed as ranges in order to reflect the use of assumptions of 1 and 2. These estimates are conservative assessments of results of recent EPA test programs and statements by the industry of the benefits derived from the catalyst. It is expected that future fuel economies will be increased significantly as the industry responds to customers' desires for increased fuel economy.

III. TRANSPORTATION CONTROL PLANS

Programs in the designated areas requiring Transportation Control Plans are continuing to move forward with a variety of remedial measures. Although no area has met its entire schedule for implementation of all required measures, most areas are generally making progress in coping with these extremely difficult problems. Measures on which selective progress has been noted include improvements to metropolitan mass transit systems, development of employer incentive programs for increased use of mass transit and carpools, comprehensive carpool improvement programs including publicity and computer matching, vapor recovery systems for control of hydrocarbon emissions, and automotive inspection and maintenance programs. In all of these program areas, there has been notable success in several cities.

Indirect source review and parking management programs are now in their initial phases of implementation. Application forms for developers have been prepared, and an extensive program of information dissemination to developers and the general public is underway. Special attention is being paid to delegation of review authority to State and local governments and to development of comprehensive parking management plans in some 20 large metropolitan areas, as the conceptual basis for making lot-by-lot reviews.

Another recent development involves formation of a joint EPA/Department of Transportation (DOT) Task Force to identify specific problems associated with implementation of the Transportation Control Plans. Officials from DOT and EPA will visit selected cities requiring Transportation Control Plans to assist local officials in articulating available options for implementing measures to obtain air quality objectives and determining areas where additional Federal assistance would be desirable.

A comprehensive program of interaction between the developer assoccia-tions and State and local governmental officials has been intensified during 1974. The objectives of this interactive effort are to better explain EPA air quality programs that affect land use, and to obtain insights and guidance from developers and local officials concerning effective techniques to implement these national environmental programs. Specific attention

has been paid to Transportation Control Plans (including parking management), indirect source reviews, air quality maintenance plans, and proposed regulations for prevention of significant deterioration of air quality. Developer groups with which close communication has been established include: International Council of Shopping Centers, National Association of Realtors, National Association of Home Builders, National Realty Committee, National Land Council, and Western Council of Retail Associations. Governmental associations with which EPA has maintained liaison on these programs in recent months include: National Governors Conference, Council of State Governments, National Association of Counties, National League of Cities, U.S. Conference of Mayors, National Association of Regional Councils, Advisory Commission on Inter-governmental Relations, and Commission on the Future of the South. Special efforts are now underway for EPA Regions to open channels of communication with developer groups in each State regarding implementation of indirect source reviews, parking management, and air quality maintenance plans. Similar activities are underway to explain these program efforts to each governor, principal State officials, and key elected officials of the counties and cities directly affected.

IV. COMMONWEALTH OF PENNSYLVANIA VERSUS EPA

In a landmark case, the U.S. Circuit Court of Appeals [Commonwealth of Pennsylvania vs. Environmental Protection Agency, No. 72-2121 (3rd Circuit, June 28, 1974)] has upheld the constitutionality of the transportation control strategies of EPA. This decision affirmed EPA's requirement that Pennsylvania enforce the strategies contained in the original Federal plan.

In November 1973, EPA issued 13 strategies designed to reduce air pollution and conserve energy by reducing automobile traffic in Philadelphia. These regulations were part of a total transportation plan for Philadelphia and some other counties.

In December 1973, Pennsylvania filed suit with the U.S. Court of Appeals challenging the constitutionality of the transportation control strategies. In a far-reaching decision with national implications, the Court upheld the legality of the strategies. This decision is expected

to establish a precedent that, under Section 113 of the Clean Air Act,[2] EPA can promulgate regulations and require States to enforce Federal regulations under court order if they fail to do so voluntarily.

V. SECTION 111(d) REGULATIONS[2]

As presently contemplated, the Section 111(d) regulatory process would proceed as follows:

1. Action is initiated by promulgation of new source performance standards for a designated noncriteria pollutant.
2. The next step is issuance by EPA of a guideline document that reflects best control technology for existing sources (considering cost), specifies the time required for compliance, and provides background information and the rationale used to select the emission level reflecting best retrofit technology. The document will designate specific emission standards.
3. States must then submit control plans, on which public hearings have been held, that contain equal or more stringent emission standards. Compliance schedules must be included in the control plan.
4. States may permit case-by-case exceptions to the standards when such exceptions are justified by unreasonable costs, physical plant limitations, or other hardships.

It is anticipated the draft regulations will cover phosphate fertilizer plants and primary aluminum plants for flourides, and sulfuric acid plants for acid mist.

Internal and external review of the draft Section 111(d) regulation is nearly completed. Unless last-minute issues arise, proposal is expected in September 1974, with promulgation in December 1974.

VI. PREVENTION OF SIGNIFICANT DETERIORATION

A reproposal of regulations to prevent significant deterioration of air quality was published in the Federal Register on August 27, 1974.[8] The basic features of the new proposal follow.

Area Classification Concept

Class I designation restricts deterioration to a minimum and is intended to preclude introduction of any additional major sources. Class II designation restricts deterioration to that associated with "normal" well-controlled growth. Class III designation imposes no additional restrictions and is reserved for areas where deterioration is "insignificant" until it reaches the national standards.

Initial Classification of Areas

All areas would be designated Class II as of promulgation, subject to redesignation by the States (or Federal Land Managers or Indian governing bodies) at any time. The proposal for Federal redesignation to Class I after 2 years has been rejected.

Administrator's Approval Authority

Proposed redesignations could normally be disapproved by the Administrator only if (1) the required procedures (specifically public participation) were not followed, (2) relevant environmental, social, or economic considerations were arbitrarily and capriciously disregarded, or (3) a State was not willing to implement the source review procedures.

Resolution of Interstate Disputes

The Administrator will provide technical assistance in resolving interstate disputes, but will not serve as arbiter. Arbitration is to be accomplished in the Courts.

Sources Subject to Review

The original list of 16 source categories has been expanded to 19, and the requirements for review of all sources with annual emissions in excess of 4000 tons has been deleted. Sources in the 19 categories must estimate the impact of minor sources in the area as part of the review procedure, but minor sources are not subjected to individual preconstruction review. Those regulations cover only total suspended particulates and sulfur dioxide.

The Baseline

The original proposal specified air quality as existing in 1972 as the baseline against which deterioration would be measured. The new regulations specify the baseline to be the date of promulgation, adjusted to account for sources approved prior to promulgation.

Impact on Fuel Switching

Existing sources that switch fuels are not subject to review under these regulations, even though they may degrade air quality and "use up" the available increment.

Boundary Considerations

A source proposed for construction in a Class II area is not permitted to violate the increment in an adjoining Class I area. However, sources proposed for construction in a Class III area are not subject to review for significant deterioration. States are cautioned to redesignate areas such that an adequate "buffer zone" is provided between any Class III areas and areas to be protected under more stringent criteria.

Best Available Control Technology

The new regulations require BACT only on major sources of particulate matter and sulfur dioxide. Further, the regulations exclude from the BACT requirement all sources for which New Source Performance Standards have been established.

Ambient Air Monitoring by Sources

Under the new regulations, the source review is based on modeling in lieu of air quality monitoring. The monitoring requirement has been deleted because it is not essential and has a questionable legal basis.

Delegation of Authority for Source Review

The Administrator would delegate authority to the States to review all new sources (except for all Indian sources and certain Federal sources). The Administrator would monitor the States' exercise of this authority in the same manner as for other new source reviews.

The regulations being reproposed are Federal regulations (40 CFR Part 52) to be implemented by the States. Guidelines for development of SIPs (40 CFR Part 51) are being written, and will be proposed prior to promulgation of the above mentioned Part 52 regulations.

VII. ATTAINMENT OF STANDARDS

There are strong indications that particulate matter standards will not be achieved in 20 to 25 urban areas excluding problems related to agricultural sources and unpaved roads in the southwestern part of the country. In some of the larger metropolitan areas, reentrainment of parti-

culate matter from automobile tires and other sources of street dust contribute to standards being exceeded. A major effort is being directed to determine the extent of this problem and to help define reasonable controls for each of the problem areas.

Another major difficulty in standards attainment involves control of oxidants and hydrocarbons. The inherent resistance to socially disruptive transportation controls and the long-range transport of automotive pollutants make this problem extremely difficult to solve. Several studies of oxidant problems which hopefully will lead to effective and reasonable control strategies are now under way.

Information resulting from studies of particulate matter and oxidants will be provided in the next progress report, scheduled for publication in March 1975.

VIII. EPA PROPOSALS TO CHANGE THE CLEAN AIR ACT[2]

Proposed changes to the Clean Air Act were sent to the Congress by EPA on March 22, 1974. The changes were designed to take into account new realities, particularly energy related problems, that have arisen since the Amendments of 1970. The Clean Air Act has been amended by the enactment of the Energy Supply and Environmental Coordination Act of 1974 (ESECA).[1]

The proposed changes to the Clean Air Act contained three major proposals relative to statutory deadlines for air quality standards. First, for those communities where needed transportation control plans would cause serious economic and social disruption, EPA would be authorized to allow up to 5 additional years for compliance with air quality standards. Secondly, EPA would be allowed to review the SIPs in order to encourage the use of clean fuels in geographic areas of highest need. Provisions similar to this second proposal have already been enacted in the ESECA. Thirdly, EPA requested authority to suspend temporarily any emission standard or limitation in cases where the Federal Energy Administration has mandated coal conversion where the national standards are not threatened. ESECA contains provisions somewhat similar to this proposal.

The bill also contained provisions to give EPA authority to set design or equipment standards for new sources and hazardous pollutants, whenever emissions limits were impracticable due to a lack of appropriate measure-

ment technology. It was also proposed that EPA enforcement authority be expanded to include civil penalties up to $25,000 for each day of emission violations. In addition, EPA transmitted the Administration's proposal that application of auto emission standards for carbon monoxide, hydrocarbons, and oxides of nitrogen be extended at the interim 1975 level through the 1977 model year.

REFERENCES FOR SECTION 2

1. Energy Supply and Environmental Coordination Act of 1974. Public Law 93-319. June 22, 1974.

2. Clean Air Act Amendments of 1970. Public Law 91 604. December 31, 1970.

3. State Air Pollution Implementation Plan Progress Report, June 30 to December 31, 1973. U.S. Environmental Protection Agency. Research Triangle Park, North Carolina. EPA-450/2-74-004. April 1974.

4. Federal Register. Volume 38, No. 6. January 10, 1973. p. 1255.

5. EPA Analysis of FEO Review of Land Phase-down Regulations. Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency. Research Triangle Park, North Carolina. April 9, 1974.

6. Federal Register. Volume 38, No. 234. December 6, 1973. p. 33733.

7. Impact of Motor Gasoline Lead Additive Regulations on Petroleum Refineries and Energy Resources, 1974-1980. Arthur D. Little, Incorporated. Contract Grant No. 68-02-1332, Task No. 4. EPA-450/3-74-032a. May 1974.

8. Federal Register. Volume 39, No. 167. August 27, 1974. p. 30999.

SECTION 3 –
STATE IMPLEMENTION PLAN PROGRESS

APPROVAL/DISAPPROVAL STATUS AND EPA PROMULGATION

States were required to submit to EPA by January 31, 1972, their plans for attainment of national ambient air quality standards for six criteria pollutants (sulfur dioxide, particulate matter, carbon monoxide, photochemical oxidants, hydrocarbons, and nitrogen dioxide).

Plans were submitted by all 55 States (the 50 states plus the District of Columbia, Guam, American Samoa, Puerto Rico, and the Virgin Islands), and EPA approved or disapproved all portions of these plans. Table 3-1 shows the status of the 55 plans with respect to the need for EPA promulgation and the degree to which these promulgations have been made. It should be noted that the number of fully approved plans and those with no regulatory disapprovals has dropped from 16 to 3 since the last semi-annual report.[1] The change in the approval/disapproval figures are the result of the recent promulgation by EPA of indirect source review regulations. Only the Florida, Alabama, and Guam State plans are presently fully approved. However, the 38 plans supplemented by EPA promulgations are being implemented although not fully approved.

Plan disapprovals with respect to "significant deterioration" or maintenance of the national standards are not reflected in Table 3-1.

EPA has the authority to propose or promulgate regulations to overcome States' regulatory deficiencies. EPA, as a matter of policy, will rescind its regulations when States enact adequate legislation or regulations. The proposals and promulgations to alleviate regulatory deficiencies and indications if legal authority is possessed by the State or if legal authority has been delegated by EPA to the State are listed in Table 3-2.

Table 3-1. STATUS OF STATE IMPLEMENTATION PLANS, SUMMARY

	As of 8/7/74	As of 4/1/74
SIPs approved through State submittal	3	16
SIPs submitted by States and requiring EPA promulgation	52	39
SIPs with all regulatory deficiencies corrected by EPA promulgation	38	26
SIPs with all regulatory deficiencies not yet corrected (finalized) by EPA promulgation	14	13

States with unapproved nonregulatory provisions are also listed in Table 3-2. Nonregulatory deficiencies can be corrected only by State action, i.e., State submittal of approval parts of the plan. The combination of the deficiencies of regulatory and nonregulatory provisions reflects the States' overall plan conformance to Federal Register requirements.

A national overview of the States' plan conformance, including progress made since the last report,[1] is summarized by specific SIP parts as follow:

Public Availability of Data

Sixteen Statewide plans were disapproved as of the last report, resulting in 13 promulgations for regulations and/or delegation of legal authority. Three Statewide plans have no legal authority, and 1 EPA promulgation has been revoked; thus there are now 15 Statewide plans disapproved.

Two States have disapproved plans due to inadequacies in 3 specific AQCRs, all 3 of which lack legal authority, including 1 with an inadequate regulation.

Required Source Recordkeeping

Eight Statewide plans had been disapproved, resulting in 7 promulgations, including 1 State that also required delegation of legal authority. The other promulgation was for delegation of legal authority only.

Of these, 2 States have disapproved plans due to inadequacies in 3 specific AQCRs, 2 for lack of legal authority and the other for an inadequate regulation.

This portion of all plans remains unchanged since the last reporting period.

Review of New Sources (Stationary)

Five Statewide plans were disapproved, resulting in 5 EPA promulgations.

An additional 5 States have disapproved plans due to inadequacies in 9 specific AQCRs. One AQCR in 1 State has new EPA promulgated regulations, 5 AQCRs in 1 State have proposed EPA regulations, and 3 AQCRs in 3 States have EPA promulgations still in effect (1 State, Arizona, has new promulgations for 2 AQCRs and prior EPA promulgation in another AQCR).

Review of New Sources (Indirect)

Fifty-two Statewide plans had been disapproved, resulting in 52 EPA promulgated regulations, including 8 States that also lacked legal authority.

Review of new sources (indirect) was not applicable in the last report; thus, all these actions are considered initial.

Compliance Schedules

Nineteen Statewide plans had been disapproved, resulting in 16 EPA promulgations of compliance schedule regulations, and 3 proposals of regulations. Since the last report, EPA has promulgated regulations for 1 State, a new deficiency has been noted in another State, and 1 Statewide EPA promulgation has been revoked.

Twelve States have disapproved plans due to inadequacies in 27 specific AQCRs. Twenty-three AQCRs in 10 States still have old promulgations; 4 AQCRs (including 1 of the 23) in 4 States still have old proposals.

Since the last reporting period, 5 AQCRs in 1 additional State progressed from proposal to EPA promulgation.

Transportation Control Plans

Eight Statewide plans were disapproved as of the last report, resulting in 1 promulgation including delegation of legal authority, 5 delegations of legal authority only, and 2 promulgations for regulations alone.

In addition, 11 States had deficiencies in 22 AQCRs, resulting in promulgations affecting 19 AQCRs, proposals in 2 AQCRs, and 1 AQCR labeled as deficient.

Table 3-2. STATUS OF STATE IMPLEMENTATION PLANS[a]

EPA Region/State/AQCR	Public availability of data	Require source record keeping	Review of new sources (stationary)	Review of new sources (indirect)	Compliance schedules	Transportation control plans	Emission limitations				Air Quality surveillance	Periodic testing and inspection	Emergency episode plan	Resources	Intergovernmental cooperation
							SO_2	TSP	HC	NO_2					
Region I															
Massachusetts	X-NLA	X		Ⓧ	X										
Metropolitan Boston						X									
Hartford-New Haven-Springfield Intrastate						X									
Maine				Ⓧ											
Rhode Island	NLA	X-NLA		X-NLA	X										
Vermont	X-NLA	X		Ⓧ											
Connecticut				Ⓧ											
New Hampshire				Ⓧ	X										
Region II															
New Jersey				Ⓧ											D
New Jersey-New York-Connecticut Interstate					X	X			X						
Metropolitan Philadelphia Interstate					X	X			X						
New York				Ⓧ	X										
Hudson Valley Intrastate			D				V								
Genesee-Finger Lakes Intrastate			D				V								
Southern Tier west Intrastate			D				V								
New York-New Jersey-Connecticut Interstate			D							D					
Central New York Intrastate			D				V								
Puerto Rico				Ⓧ											
Virgin Islands			X	Ⓧ											
Region III															
District of Columbia				Ⓧ	X	X-NLA								DV	DV
Maryland				Ⓧ	V	NLA						D		D	D
Metropolitan Baltimore Intrastate						X									
National Capital Interstate						X									
Pennsylvania				Ⓧ		X					D	D		D	D
Southwest Pennsylvania Intrastate						X									
Metropolitan Philadelphia Interstate						X									
Delaware				Ⓧ											
Virginia				Ⓧ		NLA								DV	D
National Capital Interstate						X									
West Virginia				Ⓧ	X										
Region IV															
Kentucky	DLA			Ⓧ	D										
South Carolina	DLA	DLA		X-NLA								NLA			
Florida					Ⓧ										
Tennessee				X-NLA	X								D-NLA		
Georgia				Ⓧ											
Mississippi				X-NLA											
North Carolina				Ⓧ											
Region V															
Illinois				Ⓧ		X									
Metropolitan Chicago Interstate					X		D	D							
Indiana			X	Ⓧ							D				
Metropolitan Indianapolis						Ⓧ	D	D							
Chicago Interstate							D								
Michigan			X	X-NLA	X										
Metropolitan Detroit-Port Huron Intrastate					X										
South Central Michigan Intrastate					X										
Metropolitan Toledo Interstate					X										
Minnesota	X			Ⓧ											
Ohio				Ⓧ			D								
Cincinnati and Hamilton County						Ⓧ									
Wisconsin	X-NLA			Ⓧ											

Table 3-2 (continued). STATUS OF STATE IMPLEMENTATION PLANS[a]

EPA Region/State/Area	Fuel availability & data	Regular source record keeping	Review of new sources & modifications	Review of new sources (indirect)	Compliance schedules	Transportation control plans	Emission limitations: SO_2	Emission limitations: TSP	Emission limitations: HC	Emission limitations: NO_2	Air quality surveillance	Periodic testing and inspection	Emergency episode plan	Resources	Intergovernmental cooperation
Region VI															
Arkansas				Ⓟ	(D)									D	
Alabama				Ⓟ											
Louisiana				Ⓟ										D	
New Mexico				Ⓟ	X										
Four Corners Interstate					X		X								
Texas				Ⓟ											
El Paso-Las Cruces-Alamagordo Interstate					X	X			X						
Austin-Waco Intrastate					X	X			X						
Metropolitan Houston-Galveston Intrastate					X	X			X						
Metropolitan Dallas-Fort Worth Intrastate					X	X			X						
Metropolitan San Antonio Intrastate					X	X			X						
Southern Louisiana-Southeast Texas (La.)						D			X						
Corpus Christi-Victoria									X						
Region VII															
Iowa	X-NLA	X		(X-NLA)	X										
Kansas	V		X	(X-NLA)	X	NLA							DV		
Missouri	X-NLA			(X-NLA)		NLA							D		
Nebraska	X	X	X	Ⓟ	X										
Jefferson, Gage, and Thayer Counties					X			X							
Region VIII															
South Dakota	DLA			Ⓟ											
Colorado				Ⓟ		X									
North Dakota				Ⓟ											
Montana				Ⓟ											
Helena Intrastate					D		D								
Utah	X-NLA			Ⓟ										D	
Four Corners Interstate					X			X							
Wasatch Front Intrastate			X		X	X	D			D					
Wyoming				Ⓟ							DV	NLA			
Region IX															
Arizona		X		Ⓟ										D	
Pima County APCD			X												
Phoenix-Tucson Intrastate			Ⓟ		X	X	D	X							
Arizona-New Mexico Southern Border Interstate					D		D								
Four Corners Interstate					X		X								
Hawaii				Ⓟ											
American Samoa				Ⓟ											
California	NLA			Ⓟ								D	NLA	D	
Metropolitan Los Angeles Intrastate			X		X			0	0	0					
Sacramento Valley Intrastate						X			V						
San Diego Intrastate						X			V						
San Francisco Intrastate					X	X			V						
San Joaquin Valley Intrastate					X	X		0	V						
Southeast Desert Intrastate					X	X		0	V						
Northcoast Intrastate	X-NLA	X			X										
Northeast Plateau					X										
Nevada	X	X		Ⓟ	D								D		
Washoe County			Ⓟ					(D)							
Region X															
Alaska				(X-NLA)		X									D
Northern Alaska Intrastate	NLA	NLA					X						NLA		
Cook Inlet	NLA	NLA													
Idaho	DLA			Ⓟ	X										
Eastern Washington-Northern Idaho Interstate					D		D								
Oregon				Ⓟ	X									DV	
Portland Intrastate						D									
Washington				Ⓟ	X	NLA					D			D	
Puget Sound Intrastate						X									
Eastern Washington-Northern Idaho						X									

[a] X = promulgation, O = proposal, V = revocation, D = deficiency, NLA = no legal authority, DLA = legal authority delegated by EPA, encircled items represent actions taken since last report.

Emission Limitations (Sulfur Dioxide)

As of the last report, 10 States had disapproved plans due to inadequacies in 15 specific AQCRs. There are presently 3 AQCRs in 2 States with old deficiencies, 6 AQCRs in 5 States with old proposals, and 2 AQCRs (including 1 of the 6 AQCRs) in 2 States with old promulgations.

However, 4 AQCRs in 1 additional State submitted approvable plans, thereby correcting this deficiency and negating the need for final rulemaking on the EPA proposal.

Emission Limitations (Total Suspended Particulates)

There were no Statewide disapprovals.

Eight States were disapproved due to inadequacies in 14 specific AQCRs, resulting in proposals for 9 AQCRs in 2 States, 3 AQCRs in 3 States where EPA has promulgated regulations, and 2 AQCRs in 1 State being deficient.

Since the last report, one AQCR in Washoe County, Nevada, has a new proposal.

Emission Limitations (Hydrocarbons)

Three State plans covering 14 AQCRs had been disapproved, resulting in EPA promulgations in 14 AQCPs in 3 States.

Since the last report, EPA has revoked promulgations in 5 AQCRs (all in the same State with the outstanding proposal).

Emission Limitations (Nitrogen Dioxide)

Three AQCRs in 3 States still have EPA proposals; thus, no change has taken place since the last report.

Air Quality Surveillance

Four States were judged to be deficient in the last report. One State (Wyoming) has corrected its deficiency, leaving 3 States having plan deficiencies in this area. Section 6 discusses actual implementation of this part of the plans.

Periodic Testing and Inspection

Five States were disapproved, 2 due to no legal authority and 3 because the submittal was deficient. Since the last report, there has been no change.

Emergency Episode

Since the last report, 1 State has corrected its deficiency, and 1 additional State has been found as lacking legal authority. There are now 3 States still deficient and 1 State disapproved only for lack of legal authority.

Resources

Eleven States had plan deficiencies in resources. Since the last report, 3 States corrected their deficiencies; thus, leaving 8 States deficient in regard to planned provision of adequate resources. As the figures in Section 7 indicate, the States in general still need more resources to implement fully the plan provisions.

Intergovernmental Cooperation

Six States were deficient in intergovernmental cooperation. Since the last report, 1 State has overcome its deficiency; thus, leaving 5 States deficient.

Summary

Table 3-3 represents a summary listing of the progression of SIP actions to correct deficient parts of SIPs according to (or arranged by) the deficient portions. Table 3-4 represents a specific breakout of a summary listing of the progression of SIP actions to overcome deficient parts of SIPs arranged according to EPA Regional Offices. Tables 3-3 and 3-4 depict progress in respect to both Statewide plans and specific AQCRs. The tables also reflect the'total' number of actions.

MAINTENANCE OF NATIONAL STANDARDS

Air Quality Maintenance Area Designations[2]

The States were required by the Administrator to identify by May 10, 1974, areas that have the potential to exceed any national standard within the next 10-year period because of current air qualty and/or projected growth.[3] EPA's final designation of the Air Quality Maintenance Areas (AQMAs) is required by that same promulgation by August 16, 1974.

On July 10, 1974, AQMA designations were proposed for all areas in the United States except those States within EPA Region V.[4] Proposed AQMA designations for States within Region V appeared in the Federal Register

Table 3-3. SUMMARY LISTING OF PROGRESS OF SIP ACTIONS BY DEFICIENT PORTIONS[a]

	Public availability of data	Require source record keeping	Review of stationary sources	Review of indirect sources	Compliance schedules	Transportation control plan	Emission limitations				Air quality surveillance	Periodic testing and inspection	Emergency episode plan	Resources	Intergovernmental cooperation	Total by type of action taken
							SO_2	TSP	HC	NO_2						
State correction of non-regulatory portion	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1(1,0)	0	1(1,0)	3(3,0)	1(1,0)	6(6,0)
Revocation	1(1,0)	0	0	0	1(1,0)	0	4(0,4)	0	5(0,5)	0	N/A	N/A	N/A	N/A	N/A	11(2,9)
New EPA promulgation	0	0	2(0,2)	52(52,0)	1(1,0)	3(1,2)	0	0	0	0	0	0	1(0,1)	0	0	59(54,5)
New EPA proposal	0	0	0	0	0	0	0	1(0,1)	0	0	0	0	0	0	0	1(0,1)
New deficiencies	0	0	0	0	1(1,0)	0	0	0	0	0	0	0	0	0	0	1(1,0)
No change since last report	18(16,2)	11(8,3)	13(5,8)	0	43(17,26)	35(8,27)	12(1,11)	8(0,8)	10(0,10)	3(0,3)	3(3,0)	5(5,0)	4(4,0)	8(8,0)	5(5,0)	178(80,98)
Total	19(17,2)	11(8,3)	15(5,10)	52(52,0)	46(20,26)	38(9,29)	16(1,15)	9(0,9)	15(0,15)	3(0,3)	4(4,0)	5(5,0)	6(5,1)	11(11,0)	6(6,0)	256(143,113)

[a] Numbers in parentheses indicate actions by number of States (left) and number of AQCRs (right).

Table 3-4. SUMMARY LISTING OF PROGRESS OF SIP ACTIONS BY REGIONAL OFFICE[a]

	I	II	III	IV	V	VI	VII	VIII	IX	X	Total
State correction of non-regulatory portion	0	0	3(3,0)	0	0	0	1(1,0)	1(1,0)	0	1(1,0)	6(6,0)
Revocation	0	4(0,4)	1(1,0)	0	0	0	1(1,0)	0	5(0,5)	0	11(2,9)
New EPA promulgation	6(6,0)	4(4,0)	6(6,0)	7(7,0)	9(7,2)	5(5,0)	4(4,0)	6(6,0)	7(5,2)	5(4,1)	59(54,5)
New EPA proposal	0	0	0	0	0	0	0	0	1(0,1)	0	1(0,1)
New deficiencies	0	0	0	0	0	1(1,0)	0	0	0	0	1(1,0)
No change since last report	11(9,2)	15(3,12)	19(14,5)	7(7,0)	17(7,10)	23(3,20)	15(13,2)	14(5,9)	43(10,33)	19(9,10)	178(80,98)
Total	17(15,2)	23(7,16)	29(24,5)	14(14,0)	26(14,12)	29(9,20)	21(19,2)	21(12,9)	56(15,41)	25(14,11)	256(143,113)

[a] Numbers in parentheses indicate actions by number of States (left) and number of AQCRs (right).

on August 12, 1974.[5] Because of the delayed proposal of some AQMA designations, the proposed date for Federal Register publication of a final AQMA list has been delayed. Progress toward designation of areas in all 10 EPA Regions is quantified as follows.

Total AQMAs proposed	188
Total AQMAs designated for total suspended particulate	167
Total AQMAs designated for sulfur dioxide	56
Total AQMAs designated for carbon monoxide	24
Total AQMAs designated for ozone	54
Total AQMAs designated for oxides of nitrogen	9

Specific proposed areas are shown by State and pollutant category in Table 3-5.

Recommended Amendments to 40 CFR Part 51

Proposed amendments to 40 CFR Part 51[2] have been drafted to aid in developing and analyzing AQMAs. Some changes will be made in Section 51.1 - Definitions, and a Subpart D - Maintenance of National Standards will be amended to Part 51. Subpart D outlines the format for a maintenance plan and discusses the information that must be included therein. The major portions of the proposed Subpart D are:

1. AQMA analysis.
2. AQMA plans
3. Resources.
4. Intergovernmental cooperation.
5. Emission data format.

A new appendix is also proposed as an amendment to Part 51. This appendix, entitled Air Quality Maintenance Measures, presents brief descriptions of several administrative and technical approaches for air quality maintenance area plans.

The proposal package to amend Part 51 is being prepared and will appear in the Federal Register this fall.

Development of Air Quality Maintenance Plans

Air Quality Maintenance Plans (AQMP) should be in draft form by February 1975 for final submittal to EPA in June 1975. To aid the States in the preparation of these AQMPs, EPA is progressing in developing guide-

Table 3-5. PROPOSED AQMAs BY REGION, STATE, AND POLLUTANT CATEGORY[a]

EPA Region/State/AQMA[b]	Total AQMAS by State	Pollutant				
		TSP	SO_2	CO	O_x	NO_2
Region I						
Connecticut	1					
The Connecticut AQMA		S	S	S	S	
Massachusetts	4					
Boston		S	S		S	
Springfield		S			S	
Worchester		S				
Lawrence-Haverhill		S				
Rhode Island	1					
Metropolitan Providence		S	S		S	
Region II						
New Jersey	11 (F)					
Allentown-Bethlehem-Easton, Pennsylvania-New Jersey		F			F	
Jersey City		F				
Long Branch-Asbury Park		F				
New Brunswick-Perth Amboy-Sayreville		F			F	
Newark		F			F	
Morris					F	
Bergen		F				
Passaic					F	
Philadelphia, Penn.-New Jersey					F	
Trenton					F	
Salem					F	
New York	10					
Binghamton		S				
New York City Metropolitan		S	S	S	S	S
Niagara Frontier		S	S			
Utica-Rome		S				
Elmira-Corning		S				
Rochester		S				
Jamestown		S				
Syracuse		S				
Capital District		S	S			
Mid-Hudson		S				
Puerto Rico	4					
Ponce		S				
San Juan		S				
Guayanilla		S				
Penuelas		S				
Region III						
District of Columbia	1 (F)					
National Capital (DC portion)		F	F		F	
Maryland	3 (F)					
Baltimore		F	F		F	F
National Capital (Maryland portion)		F			F	F
Potomac River Basin		F				

Table 3-5 (continued). PROPOSED AQMAs BY REGION, STATE, AND POLLUTANT CATEGORY[a]

EPA Region/State/AQMA[b]	Total AQMAS by State	Pollutant				
		TSP	SO_2	CO	O_x	NO_2
Region III (continued)						
Pennsylvania	12 (F)					
Allegheny County		F	F		F	
Allentown-Bethlehem-Easton		F				
Beaver Valley Air Basin		F	F			
Erie Air Basin		F				
Harrisburg Air Basin		F				
Johnstown Air Basin		F				
Lancaster Air Basin		F				
Monongahela Valley Air Basin		F	F			
Reading Air Basin		F				
Scranton-Wilkes-Barre Air Basin		F				
Southeast Pennsylvania Air Basin		F	F		F	
York Air Basin		F				
Virginia	7					
National Capital (Virginia portion)		S			S	
Richmond		S				
Petersburg-Colonial Heights-Hopewell		S				
Lynchburg		S				
Hampton-Newport News		S				
Norfolk-Portsmouth-Newport News		S				
Roanoke		S				
Region IV						
Alabama	3 (F)					
Birmingham		F				
Gadsden		F				
Mobile		F				
Florida	10					
Fort Lauderdale-Hollywood		S	S			
Gainesville		S				
Jacksonville		S	S			
Lakeland-Winter Haven		S	S			
Melborne-Titusville-Cocoa		S				
Miami		S	S			
Orlando		S				
Pensacola		S				
Tallahassee		S				
Tampa-St. Petersburg		S	S		S	
Georgia	3					
Atlanta		S				
Savannah		S				
Chattanooga Interstate		S				
Kentucky	1 (F)					
Louisville			F			
North Carolina	5					
Asheville		S				
Charlotte-Gastonia		S				
Greensboro		S				
Raleigh-Durham		S				
Winston-Salem		S				

Table 3-5 (continued). PROPOSED AQMAs BY REGION, STATE, AND POLLUTANT CATEGORY[a]

EPA Region/State/AQMA[b]	Total AQMAS by State	Pollutant				
		TSP	SO_2	CO	O_x	NO_2
Region IV (continued)						
South Carolina	2					
Charleston		S				
Greenville		S				
Tennessee	4 (F)					
Chattanooga Interstate		F				
Kingsport-Bristol		F				
Memphis		F				
Nashville		F				
Region V						
Illinois	6 (F)					
Chicago Interstate		F	F		F	F
Decatur		F				
Peoria		F	F			
Rock Island		F				
St. Louis Interstate		F	F		F	
Springfield		F				
Indiana	9 (F)					
Anderson		F				
Cincinnati Interstate		F	F			
Evansville		F	F			
Chicago Interstate		F	F		F	
Indianapolis		F	F		F	
Lafayette		F				
Louisville Interstate		F				
South Bend			F			
Terre Haute		F	F			
Michigan	9 (F)					
Ann Arbor		F				
Battle Creek		F				
Bay City		F				
Detroit		F	F			
Flint		F				
Grand Rapids		F				
Lansing		F				
Monroe		F				
Saginaw		F				
Minnesota	2 (F)					
Minneapolis-St. Paul			F			
Duluth		F				
Ohio	13					
Akron		S	S			
Canton		S	S			
Cincinnati Interstate		S			S	
Cleveland		S	S			
Columbus		S				
Dayton		S	S			
Hamilton-Middletown		S				
Lorain		S	S			
Mansfield		S				

Table 3-5 (continued). PROPOSED AQMAs BY REGION, STATE, AND POLLUTANT CATEGORY[a]

EPA Region/State/AQMA[b]	Total AQMAS by State	Pollutant				
		TSP	SO_2	CO	O_x	NO_2
Region V						
Ohio (continued)						
Springfield		S				
Steubenville		S				
Toledo		S				
Youngstown		S				
Wisconsin	2					
Southeast Wisconsin		S	S		S	
Lake Michigan Subregion		S				
Region VI						
Arkansas	2 (F)					
Little Rock		F				
Fort Smith		F				
Louisiana	3 (F)					
Baton Rouge					F	
New Orleans					F	
Shreveport		F				
New Mexico	6 (F)					
Albuquerque		F		F	F	
Four Corners			F	F		
Grant County			F			
Las Cruces		F		F		
Roswell				F		
Santa Fe		F		F		
Oklahoma	2 (F)					
Central Oklahoma		F	F		F	
Tulsa		F			F	
Texas	7 (F)					
Beaumont		F			F	
Corpus Christi		F			F	
Dallas-Fort Worth		F			F	
Houston-Galveston		F	F		F	
El Paso			F		F	
San Antonio					F	
Austin					F	
Region VII						
Iowa	6					
Cedar Rapids		S				
Council Bluffs		S				
Davenport		S				
Des Moines		S		S		
Dubuque		S				
Waterloo		S				
Missouri	1					
St. Louis Interstate		S			S	

Table 3-5 (continued). PROPOSED AQMAs BY REGION, STATE, AND POLLUTANT CATEGORY[a]

EPA Region/State/AQMA[b]	Total AQMAS by State	Pollutant				
		TSP	SO_2	CO	O_x	NO_2
Region VIII						
Colorado	5					
State Planning and Management District:						
No. 2		S		S	S	
No. 3		S		S	S	S
No. 4		S		S		
No. 7		S		S		
No. 11		S		S	S	
Montana	8					
Billings		S	S	S		
Great Falls		S	S	S		
Butte		S				
Anaconda		S	S			
Helena		S	S			
Kalispell		S				
Missoula		S	S	S		
Coal Area		S	S			
North Dakota	2					
Cass		S				
McLean-Mercer-Oliver		S	S		S	S
South Dakota	1 (F)					
Sioux Falls		F				
Utah	4 (F)					
Salt Lake City		F	F			F
Provo		F				F
Uintah		F	F			
Southern Utah		F	F			
Wyoming	2					
Sweetwater		S	S			
Powder River Basin		S	S			
Region IX						
Arizona	1					
Phoenix SMSA				S	S	
California	7					
Monterey County					S	
Sacramento Valley Area				S	S	
San Diego Air Basin		S		S	S	
San Francisco Bay Area		S	S		S	
San Joaquin Valley				S	S	
South Coast Air Basin		S	S	S	S	S
Southeast Desert Air Basin					S	
Hawaii	1 (F)					
Honolulu SMSA		F				
Nevada	1 (F)					
Las Vegas		F		F	F	

Table 3-5 (continued). PROPOSED AQMAs BY REGION, STATE, AND POLLUTANT CATEGORY[a]

EPA Region/State/AQMA[b]	Total AQMAS by State	Pollutant				
		TSP	SO_2	CO	O_x	NO_2
Region X						
Oregon	3					
Portland-Vancouver		S	S	S	S	
Eugene-Springfield		S				
Medford-Ashland		S				
Washington	3					
Puget Sound		S				
Spokane		S				
Portland-Vancouver		S	S	S	S	
Totals	188	167	56	24	54	9

[a] S = State designated; F = Federally designated.

[b] AQMAs are designated by central city or air basin, etc.

lines that outline procedures for analysis of problems in AQMAs and discuss various aspects of AQMA preparation.

Twelve documents concerning AQMP development are being constructed to cover the following topics:

1. Designation of AQMAs.
2. Plan preparation.
3. Control strategies.
4. Land use and transportation considerations.
5. Case studies in plan development.
6. Overview of AQMA analysis.
7. Projecting county emissions.
8. Computer-assisted area source emission gridding procedure.
9. Evaluating indirect sources.
10. Reviewing new stationary sources.
11. Air quality monitoring and data analysis.
12. Applying atmospheric simulation models to air quality maintenance areas.

The first document was published in draft form in January 1974. It has been revised. The complete guidance series is in preparation and should be available by the fall of 1974.

One of these publications, Case Studies in Plan Development, details progress toward drafting of "example" AQMPs by the cities of San Diego, Denver, St. Louis, and Baltimore. Several major problems were encountered. Attainment of standards remains difficult, especially with oxidants and particulate matter, and reasonable solutions regarding fugitive dust are lacking. Also, mechanisms to integrate air quality concerns into land use programs are not available in many cases. Delineation of the problems encountered in developing these plans and the critical procedures applied to render them into final form will be most helpful to areas in constructing their own plans.

These publications offering guidance on land development should be of considerable help to the involved areas. With progressive efforts by the States and EPA, an effective program is being developed to assure the maintenance of air quality standards throughout the country.

EXTENSIONS

Extensions for Attaining Primary Standards

The Clean Air Act[6] provides for extensions of up to 2 years beyond the 3-year period prescribed for attainment of national primary ambient air quality standards in those AQCRs where needed technology or other alternatives either are not available or will not be available soon enough to attain the primary standards.

As noted in the last SIP progress report,[1] there are 16 States involving 28 AQCRs with extensions for attainment of primary standards. Of these States, 14 required EPA promulgation; and an extension was provided as part of the control strategy.

Extension for Submitting Plans for Attaining Secondary Standards

Pursuant to Section 110(b) of the Clean Air Act,[6] EPA has granted or provided 18-month extensions for the development of control strategies for achieving secondary standards for total suspended particulates and/or sulfur dioxide. These extensions are summarized in Table 3-6 of the last SIP progress report. These were granted on the basis of an apparent lack of reasonable available control technology or equipment, or, in the case of some plans for particulate matter, inadequate data on which to base the control strategy.

As noted in the last progress report, 13 States covering 24 AQCRs were granted 18-month extensions for the particulate standard. Of these, plans for 8 States, covering 16 AQCRs, have been submitted to EPA. Plans submitted by Hawaii and Virginia have been approved by EPA. The remaining plans for 5 States and 8 AQCRs are now under development by EPA. To date, plans for 3 States having extensions for the sulfur dioxide standard covering 5 AQCRs have been submitted to EPA. Of these, Maryland's submittal for the Baltimore AQCR has been approved. Plans for the remaining 9 States and 13 portions of appropriate AQCRs are under development by EPA. This includes specific regulations for sulfur dioxide emissions from nonferrous smelters for 6 States (Arizona, New Mexico, Utah, Idaho, Montana, and Nevada) where extensions were not requested by the States but were provided by EPA.

CHANGES TO REGULATIONS FOR PREPARATION, ADOPTION, AND SUBMITTAL OF IMPLEMENTATION PLANS[2]

Variances and Enforcement Orders

As a result of decisions by the First, Second, and Eighth Circuit Courts, 40 CFR Part 51 may be amended to require that SIP regulations and legal authority not allow the issuance of variances and enforcement orders deferring compliance with the SIP beyond the dates specified in the Clean Air Act[6] unless the procedures of Section 110(f) of the Act are met. This might require virtually all States to modify their enabling authority and regulations to be consistent with the Act in this respect.

Tall Stacks

On September 14, 1973, EPA proposed changes to Part 51 setting forth the conditions that must be met before States could utilize supplementary control systems (SCS), i.e., emission curtailment during poor atmospheric dispersion conditions, and tall stacks as temporary measures when reasonably available control technology will not attain NAAQS. With respect to tall stacks the Fifth Circuit Court has issued a ruling, in a case involving the Georgia plan, that is consistent with part of EPA's September 14 proposal. Accordingly, EPA intends to finalize this proposal shortly and call for a plan revision in several States where the plan is based upon stack height regulations similar to Georgia's, i.e., regulations that allow increased emissions as a function of increased stack height.

Continuous Emission Monitoring

Although the Act requires that SIPs contain provisions to require that owners of stationary sources install emission monitoring devices, EPA felt at the time Part 51 was promulgated in 1971 that the state-of-the-art was such that it was not prudent to be specific about requirements for the installation of continuous monitoring devices. Therefore, States were only required to have the legal authority to compel sources to monitor emissions. Since 1971, much work has been done by EPA and others to develop and field test various emission monitors that are suitable in terms of accuracy, reliability, and durability for measuring sulfur dioxide, nitrogen dioxide, and opacity at certain types of sources. Therefore, a proposed change to Part 51 that will require States to specify continuous emission

monitoring for at least certain specified sources will be published shortly. The sources covered will be essentially those for which continuous monitors are required under provisions of the New Source Performance Standards. (40 CFR Part 60), except for oil-burning plants.

REFERENCES FOR SECTION 3

1. State Air Pollution Implementation Plan Progress Report, June 30 to December 31, 1973. U.S. Environmental Protection Agency. Research Triangle Park, North Carolina. EPA-450/2-74-004. April 1974.

2. 40 CFR Part 51 - Requirements for Preparation, Adoption, and submittal of Implementation Plans.

3. Federal Register. Volume 39, No. 90. May 8, 1974. p. 16343.

4. Federal Register. Volume 39, No. 133. July 10, 1974. p. 25330.

5. Federal Register. Volume 39, No. 156. August 12, 1974. p. 28906.

6. Clean Air Act Amendments of 1970. Public Law 91 604. December 31, 1970.

7. 40 CFR Part 60 - Standards of Performance for New Stationary Sources.

SECTION 4 — PLAN REVISION MANAGEMENT SYSTEM

BACKGROUND

As discussed in previous SIP progress reports,[1,2] one important issue facing EPA is whether the approved SIP control strategies will attain the national ambient air quality standards within the timeframe prescribed by the Clean Air Act.[3]

The Office of Air Quality Planning and Standards (OAQPS), EPA, has developed and is now using the Plan Revision Management System (PRMS) to assist Regional Offices in making evaluations of plan adequacy. The PRMS identifies Air Quality Control Regions (AQCRs) with potentially deficient SIPs by comparing the measured air quality values at each monitoring site within an AQCR with the future air quality values for that site projected from applicable SIP regulations, expected growth, source compliance status, Transportation Control Plans, and automotive emission standards to determine if adequate progress has been made toward attainment of the standards.

ACTION PROCEDURES

When a potential deficiency is identified, OAQPS notifies the appropriate Regional Office (as discussed in the OAQPS guideline document),[4] which will then be responsible for investigating the special details of the situation and determining the validity of the data and the magnitude of the problem. This should be done in cooperation with the respective State and local agencies. Such an investigation should include a determination of the validity of the data in question as well as a review of the effectiveness of the implementation plan control strategy. After completion of such a review, legal action (State and/or EPA) may be required to implement the SIP or revise it to correct any deficiency determined by the referenced review.

To assist the Regional Offices with their review, OAQPS provides each Region with copies of the individual PRMS site reviews for each monitoring site that has been identified as having a possible deficiency within 60 days after the end of each semiannual reporting period.

The Regional Offices that have elected to use the PRMS have indicated that it is a useful optional tool in coordinating their Surveillance and Analysis, Air Programs, and Enforcement activities in the review of SIPs. Investigations by Regional Offices are summarized in Table 4-1.

Site visits by Regional Offices are used to document the problems in potentially deficient areas. The basic objective of the site visits is to verify air quality data or to identify improper sampling procedures that can be corrected, resulting in collection of valid data in the future. Site visits can also assist in the understanding the impact of local sources, a parameter that must be reviewed as part of SIP control strategies. After completion of the site visits, some program reviews may be required for understanding of potential deficiencies. In some cases, a short-term field study may be designed to verify certain factors or assumptions.

PRMS ANALYTICAL RESULTS

This discussion presents a short overview of the current PRMS analysis of the 117 AQCRs performed by OAQPS and distributed to the Regional Offices for review. Table 4-2 provides a list of these AQCRs. A supporting document has been prepared by OAQPS that contains the detailed summary, regional maps, and important individual site reviews for each AQCR analyzed, summarized by Regional Offices. This supporting documentation is available from OAQPS upon request.

Several important factors should be considered when reviewing the analytical results. First, the projected air quality-time curves have been developed using the proportional model and applying it to an entire AQCR. In consideration of this fact, each individual site analysis involves a preliminary review that does not attempt to provide final work on the status of any AQCR. The PRMS is an optional evaluation tool made available to Regional Offices by OAQPS to assist in determining

Table 4-1. REGIONAL OFFICE INVESTIGATIONS (67 AQCRs)

	EPA region	Analytical results		Number of Regional Office investigations initiated[b]
		Number of sites analyzed	Number of sites flagged[a]	
Total suspended particulate	I	132	10	10
	II	221	41	41
	III	224	32	22
	IV	166	25	25
	V	329	80	0
	VI	120	42	42
	VII	69	19	19
	VIII	43	23	0
	IX	48	5	0
	X	64	13	0
Total		1416	290	159
Sulfur dioxide	I	101	0	0
	II	94	1	1
	III	102	1	0
	IV	101	2	2
	V	166	1	0
	VI	44	0	0
	VII	16	0	0
	VIII	4	0	0
	IX	54	0	0
	X	16	1	0
Total		698	6	3
Carbon monoxide	I	11	1	1
	II	25	5	5
	III	8	2	0
	IV	4	1	1
	V	19	4	0
	VI	2	2	2
	VII	7	2	2
	VIII	5	1	0
	IX	28	5	0
	X	6	0	0
Total		115	23	11
Oxidants	I	3	0	0
	II	17	0	0
	III	10	4	0
	IV	1	0	0
	V	9	3	0
	VI	1	0	0
	VII	5	2	2
	VIII	2	1	0
	IX	44	11	0
	X	5	1	0
Total		97	22	2

[a]Number of analyzed monitoring sites that had a potential deficiency.

[b]On a per site basis, number of planned or completed investigations (i.e. data certification, program review, etc.).

Table 4-2. AQCRs ANALYZED BY PRMS

Region I
- Hartford-New Haven-Springfield
- New Jersey-New York-Connecticut[a]
- Central Massachusetts
- Metropolitan Boston
- Metropolitan Providence
- Merrimack Valley-Southern N.H.
- Champlain Valley[a]

Region II
- New Jersey-New York-Connecticut[a]
- Metropolitan Philadelphia[a]
- New Jersey
- Northeast Penn-Upper Del Valley[a]
- Central New York
- Genesee-Finger Lakes
- Hudson Valley
- Niagara Frontier
- Southern Tier West
- Puerto Rico
- U.S. Virgin Islands
- Champlain Valley[a]

Region III
- Metropolitan Philadelphia[a]
- National Capital
- Huntington-Ashland-Portsmouth[a]
- Metropolitan Baltimore
- Northeast Penn-Upper Del Valley[a]
- Northwest Penn-Youngstown[a]
- Steubenville-Weirton-Wheeling[a]
- Central Pennsylvania
- South Central Pennsylvania
- Southwestern Pennsylvania
- East Tenn-Southwestern Va.[a]
- Central Virginia
- Hampton Roads
- State Capital (Va.)
- Kanawha Valley
- Southern West Virginia

Region IV
- East Alabama
- Metropolitan Birmingham
- Mobile-Pensacola-Panama City
- Tenn River Valley-Cumberland Mts.
- Metropolitan Memphis[a]
- Jacksonville-Brunswick
- Southeast Florida
- West Central Florida
- Augusta-Aiken
- Chattanooga
- Metropolitan Atlanta
- Paducah-Cairo[a]
- Evansville-Owensboro-Henderson[a]
- Louisville[a]
- Metropolitan Cincinnati[a]
- Huntington-Ashland-Portsmouth[a]
- Northeast Mississippi
- Northern Piedmont
- Eastern Mountain
- Metropolitan Charlotte
- Southern Coastal Plain
- Western Mountain
- Charleston
- Greenville-Spartanburg
- East Tenn-Southwestern Va.[a]
- Middle Tennessee

Region V
- Burlington-Keokuk[a]
- Metropolitan Chicago
- Metropolitan Quad Cities[a]
- Metropolitan St. Louis[a]
- Paducah-Cairo[a]
- West Central Illinois
- East Central Indiana
- Evansville-Owensboro-Henderson[a]
- Louisville[a]
- Metropolitan Cincinnati[a]
- Metropolitan Indianapolis
- South Bend-Elkhart-Benton Harbor
- Wabash Valley
- Huntington-Ashland-Portsmouth[a]
- Central Michigan
- Metropolitan Detroit-Port Huron
- Metropolitan Toledo
- South Central Michigan
- Upper Michigan
- Southeast Minnesota-La Crosse
- Duluth Superior
- Minneapolis-St. Paul
- Southwest Minnesota
- Dayton
- Greater Metropolitan Cleveland
- Mansfield-Marion
- Metropolitan Columbus
- Northwest Penn-Youngstown[a]
- Steubenville-Weirton-Wheeling[a]
- Lake Michigan
- Southeast Wisconsin

Region VI
- Central Arkansas
- Metropolitan Memphis[a]
- Northeast Arkansas
- Shreveport-Texarkana-Tyler
- Southern La-Southeastern Texas
- Albuquerque-Mid Rio Grande
- El Paso-Las Cruces-Alamogordo
- Central Oklahoma
- Northeast Oklahoma
- Southwest Oklahoma
- Amarillo-Lubbock
- Austin-Waco
- Metropolitan Dallas-Ft. Worth
- Metropolitan Houston-Galveston
- Metropolitan San Antonio

Region VII
- Burlington-Keokuk[a]
- Metropolitan Quad Cities[a]
- Metropolitan St. Louis[a]
- Metropolitan Omaha-Council Bluffs
- Metropolitan Kansas City
- Northwest Kansas
- South Central Kansas
- Southeast Missouri
- Nebraska

Region VIII
- Grand Mesa
- Metropolitan Denver
- Pawnee
- San Isabel
- Wasatch Front

Region IX
- Clark-Mohave
- Phoenix-Tucson
- Metropolitan Los Angeles
- Sacramento Valley
- San Diego
- San Francisco
- San Joaquin Valley
- Hawaii

Region X
- Northern Alaska
- Eastern Idaho
- Eastern Wash-Northern Idaho
- Portland
- Puget Sound

[a]Interregional AQCR.

the adequacy of an existing SIP. It is recognized that Regional Office personnel have day-to-day contact with the State and local agencies and are aware of unique characteristics of each AQCR. Accordingly, they are in the best postion to evaluate problem areas. PRMS was designed to provide an indication of how the AQCR is progressing toward attainment of the air quality standards based upon the air quality data available from Storage and Retrieval of Aerometric Data (SAROAD).

The system considers the applicable State and Federal regulations, Transportation Control Plans, and the Federal motor vehicle control program in the development of the projected air quality curve. Accordingly, AQCRs will not be flagged if the observed air quality is following the predicted trend even though the air quality is above the applicable standard.

A projected air quality curve is based on the assumption that local, State, or Federal agencies will continue implementing their regulations as prescribed. The resulting air quality data should reflect this enforcement by continuing to follow the projected curve.

For PRMS to be effective, it is important that air quality data contained in SAROAD be current and collected from a representative sampling network consistent with EPA minimum monitoring requirements. Additionally, consideration should be given to the sample collection and analysis methods to assure that they are consistent with EPA guidelines.

A review of the PRMS analytical results for the 117 AQCRs has resulted in the observations discussed below. In order to provide a more accurate overview of the analytical results, the 67 AQCRs that were previously analyzed and contained in the 117 AQCRs currently being tracked are included in the review.

Approximately 79 percent of the national population is represented within the 117 AQCRs. The analysis includes approximately 80 percent of all the total suspended particulates and sulfur dioxide, 97 percent of the carbon monoxide, and 55 percent of the oxidant data currently contained in the SAROAD system.

The current PRMS analysis of the progress being made toward attainment of the national ambient air quality standards for total suspended particulates involves the analysis of over 2000 monitoring sites. Of those analyzed, 15 percent were identified as being potentially deficient. This study resulted in 102 of the 117 AQCRs being identified as having a possible problem. Generally, the problems were localized, but in some cases there did appear to be a problem throughout the AQCR.

PRMS analysis of sulfur dioxide data for the 117 AQCRs indicated that very few problems exist in the 117 AQCRs relative to attainment of that national ambient air quality standard. The sulfur dioxide analysis included the review of approximately 800 monitoring sites and identified one percent of them as having possible problems. The analysis indicated that most metropolitan areas will attain the national standard for sulfur dioxide. Problems relative to attainment of the short term (24-hour and 3-hour) sulfur dioxide standard appeared to be more common than with the annual sulfur dioxide standard, and are generally observed around large isolated point sources such as power plants and smelters.

The analysis of the available carbon monoxide and oxidant data required the review of 167 and 93 sites, respectively. Approximately 18 percent of the carbon monoxide and 38 percent of the oxidant sites appeared to have problems.

REFERENCES FOR SECTION 4

1. State Air Pollution Implementation Plan Progress Report, January 1 to June 30, 1973. U.S. Environmental Protection Agency. Research Triangle Park, North Carolina. EPA-450/2-73-005. September 1973.

2. State Implementation Plan Progress Report, June 30 to December 31, 1973. U.S. Environmental Protection Agency. Research Triangle Park, North Carolina. EPA-450/2-74-004. April 1974.

3. Clean Air Act Amendment of 1970. Public Law 91 604. December 31, 1970.

4. Guidelines for Determining the Needs for Plan Revisions to the Control Strategy Portion of the Approved State Implementation Plans. Control Programs Development Division, Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency. Research Triangle Park, North Carolina. OAQPS No. 1.2-001 (Draft). November 1973.

SECTION 5 —

ENFORCEMENT OF STATE IMPLEMENTATION PLANS

The Clean Air Act amendments of 1970[1] allow 3 years from the date of SIP approval to reduce pollution levels to health-related ambient air quality standards. Except for portions of 16 States, where an extension of up to 2 years has been granted for one or more pollutants, the primary ambient air quality standards for particulate matter, sulfur dioxide, hydrocarbons, and carbon monoxide are to be met by July 1975. In order to meet this deadline, the enforcement of emission limitations in the State plans has been given first priority by EPA and State air pollution programs. Success in enforcing SIPs hinges upon the accomplishment of four major tasks.

1. The identification and investigation of possible violators to determine their compliance status.
2. Assurance that expeditious compliance schedules are established for violators.
3. Assurance that the increments of progress in compliance schedules are met in a timely manner.
4. Assurance that sources initially found in compliance or sources that come into compliance continue to meet emission requirements.

State and Federal programs face an immense task in achieving compliance, since there are estimated to be over 200,000 stationary sources subject to SIP emission standards. Of this number, however, between 18 and 20 thousand are major emitters (i.e., "point sources" - facilities individually capable of emitting over 100 tons of a pollutant per year). As a class, point sources emitted:[2]

1. 82 percent of the particulate matter emitted by all stationary sources (15,128,000 tons in 1972).
2. 86 percent of the sulfur oxides emitted by all stationary sources (29,043,000 tons in 1972).
3. 89 percent of nitrogen oxides emitted by all stationary sources (14,125,000 tons in 1972).
4. 65 percent of hydrocarbon pollutants emitted by all stationary sources (7,037,000 tons in 1972).
5. 86 percent of the carbon monoxide emitted by all stationary sources (19,037,000 tons in 1972).

Accordingly EPA has placed high priority in obtaining compliance by this class of emitters. As indicated in Table 5-1, the number of point sources investigated by States and EPA is now about 16,400 up from 12,000 in December 1973. Of these, over 10,000 point sources are now complying with applicable emission standards (up from 7600 at last report) and over 2000 are on EPA and State approved compliance schedules. Of some 3800 major emitters in violation of emission standards and without EPA approved schedules, about 1500 have State schedules that are now being reviewed by EPA. The compliance status of roughly 1500 more is in the process of being verified, and State or EPA enforcement actions are pending for the remainder. Efforts are continuing in States and EPA Regional Offices, through special contractual efforts, to determine the compliance status of all remaining point sources.

The responsibility for enforcement of SIP emission limitations is shared by EPA and States. The Clean Air Act[1] recognizes that States have first responsibility to achieve clean air within their jurisdiction. In the event States do not enforce the air pollution standards needed to achieve national ambient air quality standards, however, the Act requires EPA to take action. In accordance with the intent of the Act, the EPA air enforcement program has been designed to bolster State air enforcement efforts (1) by providing assistance to the State agencies in the forms of control agency grants, provision of specialized skill and expertise, or special contractual efforts and (2) by taking enforcement actions against selected sources when the State could not or would not enforce.

Since July 1973, EPA has conducted over 3000 investigations under the authority of Section 114 of the Act to determine source compliance status and has undertaken 275 enforcement actions under the authority of Section 113 to secure source compliance (Table 5-2). Current EPA enforcement actions are shown in Table 5-4 (at the end of the section). In many instances the table notes initiation of an EPA enforcement action that triggers action by the States. In the next 12 months, the number of investigations and EPA enforcement actions are expected to more than double. Implicit in EPA's role of assuring that the Act is implemented is the responsibility to determine that source compliance is maintained, once achieved. In many cases, the cost of properly maintaining and operating pollution control devices exceeds the initial cost of purchase and installation. In order to assure that the environmental gains produced by the initial enforcement effort continue, State and EPA programs are being initiated to monitor closely the progress sources make in meeting compliance schedule increments of progress. The Compliance Data System is now being implemented by all Regional Offices to provide a means of recording the status of source compliance, the planning of surveillance and enforcement actions, and the coordination of the efforts of the various components of Regional Offices to assure source compliance. Table 5-3 summarizes the status of CDS development.

Despite this progress in SIP enforcement, several major categories of point sources may not achieve compliance with emission standards within the time limits prescribed by the Act, delaying the attainment of ambient air quality standards. Notable among these sources are coal-fired power plants, iron and steel manufacturing plants, smelters, and industrial/commercial boilers. Special efforts now being initiated to assure compliance by these classes of sources are addressed below.

STATUS OF EPA's POWER PLANT ENFORCEMENT PROGRAM

As discussed in the last semiannual report,[3] EPA held a special public hearing last fall in Washington, D. C., to review the status of power plant compliance with sulfur dioxide (SO_2) air pollution emission limitations. The hearing was called because power plants are the largest

Table 5-1. SUMMARY OF STATUS OF COMPLIANCE BY MAJOR EMITTERS WITH SIP EMISSION STANDARDS

EPA[a] Regional Office	Total installations investigated	Number of installations in compliance	Number of installations in violation	
			With EPA approved schedules	Without EPA approved schedules
I	869	474	139	256
II	920[b]	525	328	67
III	2,371	1,208	141	1,022
IV	4,664	3,116	579	969
V	2,017	794	661	562
VI	2,108	1,780	0	328
VII	523	390	4	129
VIII	434	219	0	215
IX	1,690	1,362	185	143
X	748	561	52	135
Total	16,344[b]	10,429	2,089	3,826

[a]Information relative to each State can be obtained from EPA Regional Office.
[b]Estimated 700 or more major emitters yet to be investigated by State or EPA.

Table 5-2. SUMMARY OF EPA ENFORCEMENT ACTIVITY, JULY 1, 1973 TO JUNE 30, 1974

EPA Regional Office	Formal inquiries (Section 114 letters)	Site inspections and tests	Notices of violation	Enforcement orders and civil/criminal cases
I	108	69	17	8
II	535	71	9	3
III	149	66	40	13
IV	71	75	5	0
V	427	76	67	10
VI	106	127	1	0
VII	15	81	20	6
VIII	179	129	35	1
IX	343	439	26	5
X	54	79	8	1
Total	1987	1168	228	47

Table 5-3. STATUS OF COMPLIANCE DATA SYSTEM FILE AS OF JUNE 28, 1974

EPA Region	Point source facilities, FY 75 start level	CDS file			Comments
		Total sources	Point source facilities on file	Percent on file	
I[a]	877	868	868	99	Data fairly complete; increments to be updated soon by contractor
II	1,356	963	963	71	Many increments already updated; New Jersey information to be completely revised
III[a]	2,546	2,358	2,358	93	Contractor revising entire file
IV[a]	3,094	3,510	3,094	100	Data fairly complete; increments to be updated by contractor
V[a]	1,793	502	502	28	Contractor to complete and update file
VI[a]	3,430	79	79	2	All available schedules are on file; contractor to complete and update file
VII[a]	764	379	379	50	All schedules are on file and will be up to date soon; remaining point sources to be entered by Region.
VIII[a]	414	104	104	25	Contractor to complete and update file
IX	1,690	221	221	13	All EPA and approvable State schedules are on file; increments are being updated; remaining sources with enforcement actions being entered
X[a]	680	1,482	680	100	Data fairly complete; increments are being updated
Total	16,664	10,466	9,027	54	

[a]Contractor assistance being utilized.

source of SO_2 emissions in the United States (emitting about 60 percent of total SO_2 emissions) and because large numbers of power plants were not in compliance with SO_2 emission limitations and were not on compliance schedules to meet the limitations. Further, the national shortage of available low-sulfur coal adds to the complexity of this problem. Flue Gas Desulfurization (FGD) can remove SO_2 from the combustion gases and therefore enable power plants to meet emission requirements while using high-sulfur coal. Unfortunately, the utility industry has generally been reluctant to apply these systems.

The hearing panel found that installation of FGD systems must be greatly accelerated by the utility industry if SO_2 emission requirements adopted pursuant to the Clean Air Act are to be met in the 1970s. On the basis of utility and FGD vendor testimony, the panel concluded that the electric utility industry has not aggressively sought out solutions to the problems that they allege exist with FGD technology, and that these alleged problems can be, and have been, solved at a reasonable cost.

In implementing these recommendations, EPA has been placing high priority on the establishment of realistic compliance schedules for power plants so that SO_2 emission limitations will be met. A review of data on all power plants in the country indicated that some 90 coal-fired power plants should receive high priority for control so that primary standards will be attained in an expeditious manner. These plants total about 65,000 megawatts generating capacity, which is roughly 40 percent of all coal-fired generating capacity in the United States. EPA Regional Offices have sent Section 114 letters to almost all of these plants to determine if the companies have any firm plans to comply with applicable SO_2 emission limitations. With the exception of a few that had made contractual obligations for obtaining low-sulfur coal, it was found that there were generally no such plans.

Consequently, EPA has begun enforcement actions against power plants. During this semiannual period, notices of violations have been issued to 7 utility companies for SO_2 violations at 18 plants. Subsequent orders to be issued for the plants will be expeditious and reasonable, taking into account the time required to install control equipment or to obtain

low-sulfur coal. The number of plants required to control within each company will be considered in the development of these orders. EPA is also negotiating with several utility companies for Federal consent orders that would establish expeditious but reasonable schedules for compliance through installation of FGD systems.

Overall, EPA's power plant enforcement program has been moving ahead at a rapid pace. During this semiannual period, the program has moved from the basic data gathering phase to active enforcement. It is anticipated that all the additional priority plants will be the subject of enforcement activity during the next semiannual period. A major obstacle toward meeting this objective is that almost two-thirds of the plants identified for enforcement priority are under SIPs that are presently the subject of litigation or that are in the process of being revised. EPA has placed high priority on getting these problems resolved.

OTHER PROBLEM SOURCE CATEGORIES

In addition to power plants, there are several other categories of major sources that pose particularly difficult compliance problems. Some of these sources will not be in compliance by mid-1975, and vigorous Federal enforcement is required to assure compliance as soon as practicable. Source categories include industrial boilers, iron and steel plants and smelters, which, as a class, are responsible for more than 20 percent of particulate matter and over 24 percent of sulfur dioxide emitted by all stationary sources. EPA has taken the following actions for these categories of polluters:

1. Steel mills - The iron and steel industry in the United States consists of over 200 companies, with plants located in 37 states (primarily in the north-central part of the United States and in Alabama and Texas). State and local enforcement programs have had difficulty enforcing standards for these sources due to the size and complexity of the pollution control problems. In the last 6 months, EPA has initiated enforcement actions against 9 of the largest iron and steel companies (Table 5-4).

2. Industrial boilers - There are about 3500 coal-fired industrial and commercial boilers in the United States. Control of these sources is especially needed in urban areas not yet meeting the primary ambient air quality standards for sulfur dioxide. Basic enforcement problems are presented by the large number of these sources and the difficulty in establishing reasonable and expeditious compliance schedules when the availability of low-sulfur fuels may be in question and the availability of FGD systems is limited. An analysis is being conducted to pinpoint violating sources within this large group of emitters for selective EPA and/or State enforcement actions.
3. Smelters - Smelters alone contribute about 10 percent of the sulfur dioxide emissions from all stationary sources. Abatement at these sources, essential to the achievement of ambient air quality standards in many parts of the western United States, has been delayed due to difficulty in establishing adequate control technology.

REFERENCES FOR SECTION 5

1. Clean Air Act Amendments of 1970. Public Law 91 604. December 31, 1970.

2. 1972 National Emissions Report. U.S. Environmental Protection Agency. Research Triangle Park, North Carolina. EPA-450/2-74-012. June 1974.

3. State Air Pollution Implementation Plan Progress Report, June 30 to December 31, 1973. U.S. Environmental Protection Agency. Research Triangle Park, North Carolina. EPA-450/2-004. April 1974.

Table 5-4. CURRENT EPA ENFORCEMENT ACTIONS

UNDER STATE IMPLEMENTATION PLANS

JANUARY 1974 TO JUNE 30, 1974

NOTE: This table contains only those actions initiated, or continuing through the semi-annual period by EPA to enforce SIP emission limitations. Enforcement actions are grouped by EPA Regional Office and State, and listed alphabetically by company within each State.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
REGION I				
Connecticut, Rockville	Amerbelle Corp. Printing.	Organic emissions	Notice of violation issued 8/5/74.	Conference held 8/19/74.
Connecticut, Bridgeport	Bullard Castings, Inc. Cupula Furnaces	Violation of Conn. particulate matter (process emissions visible emissions and fugitive dust) regs.	Notice of violation issued 10/12/73. Admin. order issued 2/14/74.	The Co. has complied with the second five increments of the order. The state is monitoring progress. The case is pending.
Connecticut, Derby	Hull Dye and Print Print Works Textile Operation	Violations of visible emission, hydrocarbon emission limitations and nuisance caused by uncontrolled emissions from the drying operation.	Notice of violation issued 12/5/73. Admin. order issued 2/14/74.	A conference was held on 12/27/73. They complied with the first increment on 9/15/74. The State is monitoring their progress. The case is pending.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Connecticut, Waterbury	Waterbury Rolling Mills, Inc. Metallurgical Operation	Violations of visible emissions caused by uncontrolled metallurgical operations.	Notice of violation issued 10/31/73. Admin. order issued 2/14/74.	The co. has not complied with the first increment of order due to finance difficulties. Co. is presently negotiating with Conn. Development authority to act as guarantor to private financing.
Maine, Winslow	Scott Paper Co. Paper Manufacture	Violation of Me. Implementation Plan dates.	Consent order was issued 6/7/74.	EPA is monitoring company's progress in accordance with the Consent Order, State Implementation dates.
Massachusetts, Boston	Boston Edison Co. New Boston Station Power Plants	Violation of visible emission regs.	Notice of violation issued 11/9/73.	114 letter Issued. The Co. will conduct stack tests to correlate Edison test methods with EPA's Method #5. Case

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Massachusetts Boston	Boston Edison Co. L Street Station Power Plant	Violation of visible emission regs.	Notice of violation issued 11/9/73.	114 letter issued. The Co. will conduct stack tests to correlate Edison test methods with EPA's Method #5. Case pending.
Massachusetts, Everett	Boston Edison Co. Mystic Station Power Plant	Violation of visible emission regs.	Notice of violation issued 11/9/73.	114 letter issued. The Co. will conduct stack tests to correlate Ediston test methods with EPA's Method #5. Case pending.
Massachusetts, Lawrence	Lawrence, City of Open Burning	Violation of open burning regs.	Notice of violation issued 6/6/73.	Incinerator has been shut down and transfer station is being constructed the incinerator site. Upon completion the transfer station construction, the open face of the dump will be covered under the supervision of the Department of Public Health Solid Waste Office.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Massachusetts, Somerset	New England Power Co.: Brayton Point Power Plant	Violation of SO2 particulate regs.	Notice of violation issued 9/6/73.	Electrostatic precipitators are being upgraded. Further studies will be conducted on flue gas desulfurization. The case is pending.
Massacussetts, Sommerville	Sommerville Smelting Metallurgical Process	Violation of visible emission reg.	Notice of violation issued 1-8-74. Admin. order issued 4/30/74	The Co. has submitted final plans and specs to MA Dept. of Public Health for approval. The case is pending.
Massachusetts	Penn Central Trans. Company Passenger and Freight Terminals	Transfer of cement products creating visible emissions: trucks idling contrary to requirements of Mass. SIP.	Notice of violation issued 7/2/73. Admin. order issued 4/12/74 for commuter passenger service.	Commuter passenger service ordered to cease excessive idling violations. The case is pending.
Massachusetts Arlington	Wilfret Brothers Realty Trust Incinerator	Violation of Mass incinerator regs.	Notice of violation issued 7/2/73. Admin. order issued 12/3/73.	Presently in compliance with terms of order.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Rhode Island Cranston	ITT Grinell Gray Iron Foundry	Violaton of visible emissions and reg.	Notice of violation issued 2/7/74.	Co. contemplates sale to Fairmont Foundry Order is scheduled to be issued 8/16/74 for both co.s and require the installation of appropriate air pollution control equipment.
Rhode Island Smithfield	Narragansett Gray Iron Foundry Gray Iron Foundry	Violation of visible emissions and particulate emission limitations.	Notice of violation issued 12/10/73. Admin. order issued 2/14/74.	Conference held 1/17/74. The Co. has complied with the first increment the order. A delay in equipment delivery required an amendment to the order.
Rhode Island Ashton	Owens-Corning Fiberglass Manufacturing	Violation of particulate and visible emissions regs.	Notice of violation issued 2/4/74. Admin. order issued 3/29/74.	Company chose to achieve compliance by process order issued 3/29/74. stack tests to verify such such compliance are scheduled to be completed by 8/31/74.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Rhode Island Lincoln	Taggart Sand Products	Violation of fugitive dust and visible emissions regs.	Notice of violation issued 2/14/74. Admin. order issued 4/18/74.	Company complying with order.
Rhode Island Woonsocket	Woonsocket, City of Open Burning	Violation of open burning regs.	Notice of violation issued on 2/7/73. Order issued 7/7/73.	3/7/73, a conference was held held with representatives of the city, who agreed to cease all open burning of debris except that generated by HUD. Region I is attempting informally to assist HUD in the resolution of its disposal problems.
Vermont Ansonia	Anaconda American Brass Smelting	Operation of 10 uncontrolled induction furnaces	Administrative order issued 5/16/74.	Presently in compliance with terms of order.
Vermont Burlington	J.B. Moran Generating Station Power Plant	Violation of particulate and opacity regs.	Notice of violation issued on 8/24/73.	The company is modifying control equipment. EPA is monitoring progress. The case is pending.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STAIUS
REGION II				
New York Rochester	Castle Co., Div. of Sybron Corp. Chemical Mfg.	Failure to respond to §114 inquiry.	Administrative order issued 6/4/74.	Source in compliance with order.
New York Green Island	Ford Motor Co. Auto parts Mfg.	Violation of opacity reg.	Notice of violation issued 1/11/74.	State action initiated company put in new boiler and upgraded operating procedures.
New York Mount Marion	Hudson Valley Light Weight Aggregare Corp.	Failure to respond to §114 inquiry.	Adminis. order is-	Complied with order.
New York Ft. Washington	North Hempstead Municipal Incinerator Incinerator	Violaton of opacity regs.	Notice of violation issued 6/7/74.	Conference held on 6/26/74.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Puerto Rico, Pueblo Viejo	Puerto Rican Cement, Inc. Lime Kilns	Violation of opacity reg.	Notice of violation issued 5/9/74.	Conference held 6/6/74.
U.S. Virgin Ils. Frederiksted	St. Croix Stone and Sand, Inc. Rock Crushing	Violation of particulate emissions reg.	Notice of violation issued 1/28/74. Admin. order issued 4/18/74.	Source presently in compliance with EPA order.
Virgin Island St. Croix	Hess Oil Virgin islands Corp. Oil Refinery	Violation of federally promulgated new source review requirements (expansion in progress)	Notice of violation issued 6/6/74.	Conference held 6/20/74. Further evidence to be presented 8/20/74.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
REGION III				
Delaware Claymont	Allied Chemical Corp.	Violation of mass emission rate regs.	Notice of violation issued on 5/24/72. Order comply issued on 6/16/72. Amended order issued on 6/18/74.	Commencing on 11/10/72, bimonthly progress reports have been submitted to EPA resulted in construction schedule with increments of progress, schedule is presently being complied with. Amended order issued to discontinue monthly reporting.
	Sulfuric Acid Plant			
Maryland, Eastern Shore	Bayshore Foods, Grain Dryer	Violation of visible emission standards	12/28/73 - Notice of violation.	1/24/73 - conference held 7/5/74 draft consent orders mailed to co.
Maryland, Rockville	Montgomery Cty. Incinerator Incinerator	Failure to respond to s114 letter.	Administrative order issued 4/23/74.	Response received engineering review being performed.
Maryland,	PEPCO Chalk Point	Violation of SO2 and particulates	Notices of violation(3) issued 5/31/74.	Conference held on 7/25/74.
Maryland	PEPCO Dickerson	Violation of SO2 and particulates.	Notices of violation(3) issued 5/31/74.	Conference held on 7/25/74.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Maryland, Eastern Shore	Perdue, Inc. Grain Dryer	Violation of visible emission standards	12/28/73 - Notice of violation.	1/24/73 - conference held 7/5/74 - draft consent orders mailed to co.
Maryland, Baltimore	Southern States Grain Cooperative, Grain Dryer	Violation of visible emission standards	12/28/73 - Notice of violation	1/24/73 - conference held 7/5/74 draft consent orders mailed to co.
Maryland, Eastern Shore	Snow Hill Grain, Grain Dryer	Violation of visible emission standards	12/28/73 - Notice of violation	1/24/73 - conference held 7/5/74 - draft consent order mailed to co.
Maryland, Eastern Shore	Whittington Poultry Farms Grain Dryer	Violation of visible emission standards	12/28/73 - Notice of violation	1/24/73 - conference held 7/5/74 draft consent orders mailed to co.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Pennsylvania Allentown	Penn. Elec. Co. Seward Station Power Plant	Violation of particulates and SO2 standards.	Notice of violation issued 6/19/74.	
Pennsylvania Clairton	U. S. Steel Clairton Works Coke Ovens	Violations of opacity and particulate emission standard.	Notice of violation issued 11/8/73. Referred to U.S. Attv. for combustion stacks door leaks, & topside emission on 6/7/74. Referral to U.S. Atty. for pushing sent on 7/11/74.	
Pennsylvania, Courtney	West Penn Power Co. Mitchell Station Coke Ovens	Violation of SOx and particulate stds.	Notice of violation issued 9/13/73.	One conference held. A second conference to be held in August, 1974.
Virginia Arlington	Arlington County Incinerator Sludge Incinerator	Violation of particulate emission standards.	Notice of violation sent on 3/14/74, order to stack test issued 7/2/74.	Awaiting stack test results.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Pennsylvania, Wyomissing	Metals Engineering, Inc. Metallergy Shop	Failure to respond to s114 letter.	Order issued on 4/3/74.	Company complied with order on 5/15/74.
Pennsylvania, Reading	Reading Gray Iron Casting, Inc. Gray Iron Foundry	Failure to respond to s114 letter.	Order issued on 4/3/74.	Company responded to order on 5/15/74.
Pennsylvania, Allentown	Penn. Elec. Co. Front St. Station Power Plant	Violation of particulates and SO2 standards.	Notice of violation issued 6/19/74.	
Pennsylvania Allentown	Penn. Elec. Co. Warren Station Power Plant	Violation of particulates and SO2 standards.	Notice of violation issued 6/19/74.	
Pennsylvania Allentown	Penn. Elec. Co. Shawville station Power Plant	Violation of particulates and SO2 standards.	Notice of violation issued 6/19/74.	

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Virginia Arlington	Arlington County Incinerator Sludge Incinerator	Violation of particulate emission standards.	Notice of violation sent on 3/15/74, order to stack test issued 7/2/74.	Awaiting stack test results.
Virginia Danville	Boise Cascade Boiler	Violation of particulate emission standards.	Notice of violation on 3/15/74.	Company complied with order. Met first increment.
Virginia Danville	Brantly Generating Station Power Plant	Violation of particulate emission limitation.	Notice of violation issued 6/4/74.	Conference held on 7/29.
Virginia Richmond,	Federal Paper Board Inc. Boiler	Violation of particulate emission limits.	Notice of violation issued 4/17/74.	Awaiting stack test results.
Virginia Alexandria	PEPCO Station Power Plant	Violation of opacity limitation.	Notice of violation issued 1/30/74. Administrative order issued 6/25.	Conference held 2/27/74. Meeting to discuss order with Co. scheduled for 7/25/74.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
REGION IV				
Alabama, Demopolis	Lone Star Industries, Inc. Cement Plant	Violation of Federally approved Alabama Implementation plan for particulate and SO_2	Notice of violation issued 1/[illegible]/74.	A conference was held on 7/2/74. An administrative order was issued on 7/17/74.
Florida, Barton	W. R. Grace Phosphate rock dryers	Violation of Fla. PM and SO_2 reg.	Notice of violation issued 8/11/74.	Order issued 8/19/74.
Florida, Gibsonton	Gardinier Inc. Phosphate rock dryers	Violation of Fla. PM and SO_2 reg.	Notice of violation issued 8/11/74.	Order issued 8/19/74.
Florida, Nichols	Mobile Chem. Co. Phosphate rock dryers	Violation of Fla. PM and SO_2 reg.	Notice of violation issued 8/11/74.	Order issued 8/19/74.
Florida Palatka	Hudson Pulp & Paper Co. Pulp & Paper Plant	Source missed 1st increment of State adopted Federally approved compliance schedule for SO_2 and particulate matter.	Notice of violation issued 12/20/73.	Administrative order issued 1/21/74.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Tennessee, Columbia	Monsanto Industrial Chem. Co. Chem. Co.	Violation of 4 increments of federally promulgated categorical compliance schedule.	Notice of violation issued 4/8/74.	
Tennessee, Columbia	Monsanto Industries Chem. Co. Rotary Kilns	Violation of Tenn. SO_2 reg.	Notice of violation issued 4/20/74.	

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
REGION V				
Illinois, Chicago	American Brick Company Brick Kiln & Crusher	Violation of Ill. opacity and particulate emission standards.	Notice of violation issued 1/21/74.	State suit filed, no further Federal action at this time.
Illinois, East Peoria	Central Illinois Boilers	Violation of Federal compliance schedule for Illinois particulate emission standard.	Notice of violation issued 12/20/73.	Conference held 8/1/74.
Illinois Bartonville	Central Illinois Light Co. Edward Station Power Plant	Violation of SOx reg & Federal compliance schedule.	Notice of violation issued 5/31/74.	Conference held 8/1/74
Illinois, Granite City	Granite City Steel Co. Coke Ovens	Violation of Ill. particulate std. and federal compliance schedule.	Notice of violation issued 3/13/74.	State action pending.
Illinois Blue Island	Illinois Brick Company Brick Kiln	Violation of particulate standard.	Notice of violation issued 3/4/74.	Complaint filed before Illinois Pollution Control Board, further Federal action deterred.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Illinois, Chicago	International Harvester Co. Coke Oven	Violation of federal compliance schedule for coke oven pushing and quenching.	Notice of violation issued 11/29/73. Consent order issued by EPA 4/11/74.	In compliance with terms of order.
Illinois, Thornton	Marblehead Lime Company	Violation of Ill. particulate matter standard.	Notice of violation issued 3/19/74.	Conference held 7/3/74.
Illinois Lawrenceville	Texaco Refinery Inc. Storage Tanks	Violation of carbon monoxide and hydrocarbon stds.	Notice of violation issued 3/26/74.	Conference 5/8/74.
Illinois, Chicago	Republic Steel Corp. Coke Oven	Violation of federal compliance schedule for coke oven pushing and quenching.	Notice of violation issued 11/29/73.	In compliance with with terms of order.
Illinois Skokie	Skokie, Village of Municipal Incinerator	Violation of particulate matter emission std.	Notice of violation issued 2/20/74. Consent order issued 4/2/74.	

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Illinois, Elgin	Woodruff Edwards, Inc. Cupola	Violation of carbon monoxide stds.	Notice of violation issued 6/7/74.	Awaiting results of stack test.
Indiana, Newburg	ALCOA Aluminum Smelter	Violation of particulate matter emission standard.	Notice of violation issued 1/4/74.	Awaiting stack test results.
Indiana Munster	American Brick Co. Brick Kiln & Crusher	Violation of particulate and opacity standards.	Notice of violation issued 1/21/74.	Awaiting results of stack test.
Indiana, Whiting	American Oil Co. Oil Refinery	Violation of sulfur oxide and opacity standards.	Notice of violation issued 9/10/73.	Presently on enforceable state order.
Indiana East Chicago	Blaw-Know Foundry Open Hearth Furnace	Violation of particulate matter emission standards.	Notice of violation issued 1/21/74. Administrative order issued 4/15/74.	

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Indiana Bloomington	Bloomington Crushed Stone Co. Quarry	Violation of opacity and particulate matter emission standards.	Notice of violation issued 10/31/73.	Presently in compliance with regulation.
Indiana Terre Haute	C.F. Industries Ammonium Nitrate Process.	Violation of particulate matter emission standards.	Notice of violation issued 10/9/73, Admin. order issued 1/31/74.	Presently complying with terms of order.
Indiana Cannellon	Can-Tex Industries, Inc. Shale Grinding	Violation of particulate matter emission standard.	Notice of violation issued 10/17/73 Admin. order issued 1/24/74.	Presently in compliance with terms of order.
Indiana Largo	Celotex Corporation Boilers	Violation of particulate matter emission standard.	Notice of violation issued 1/23/74. Admin. order issued 3/26/74.	Presently in compliance with order
Indiana Indianapolis	Central Soya Co. Boilers	Violation of particulate matter emission standard.	Notice of violation issued 10/12/73.	Presently in compliance
Indiana Cayuga	Colonial Brick Corp. Brick Mf.	Violation of particulate emission standard.	Notice of violation issued 12/4/73.	

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Indiana Wabash	Container Corp. of America Boilers	Violation of particulate matter and SO2 emission std.	Notice of violation issued 10/9/73.	State schedule adopted.
Indiana Richmond	Dana Corp. Cupolas	Violation of opacity and particulate matter emission standards.	Notice of violation issued 10/30/73.	Presently in compliance.
Indiana Indianapolis	Ford Motor Co. Boilers paint spraying, drying oven & degreaser.	Violation of hydrocarbon and particulate matter emission standards.	Notice of violation issued 6/11/74.	
Indiana, Marion	Foster Forbes Glass Co. Glass Mfg.	Source refused info. requested in section 114 letter. Violation of particulate matter emission standard.	Admin. order issued 11/21/73. Notice of violation issued 1/2/74.	Awaiting stack test.
Indiana Noblesville	Hamilton Cty. Asphalt, Inc. Asphaltic Concrete	Violation of particulate matter emission standard.	Notice of violation issued 11/19/73. Admin. order issued 1/28/74.	Presently in compliance with terms of order.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Indiana Petersburg	Indiana Rural Elec. Coop., Inc. Power Plant	Violation of opacity and particulate matter emission standards. (SO2 ted).	Consent order issued 7/10/74.	Awaiting Co. and state signatures.
Indiana Bloomington	Indiana U. Power Plant	Violation of particulate matter emission standard.	Notice of violation issued 10/24/73 admin. order issued 1/8/74.	Presently in compliance with terms of order
Indiana, East Chicago	Inland Steel Co. Steel Mill	Violation of opacity emission standard.	Notice of violation issued 7/18/73.	At present time, no further Federal action anticipated since cited source is on enforceable State schedule.
Indiana, Indianapolis	International Harvest-Co. Boiler	Violation of particulate matter emission standard.	Notice of violation issued 10/26/73.	
Indiana Richmond	Johns-Manville Corp. Glass Mfg.	Violation of particulate matter emission standard.	Notice of violation issued 6/26/74.	

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Indiana, Terre Haute	J.W. Davis Co. Boilers	Violation of particulate matter and opacity emission standards.	Notice of violation issued 4/26/74; Admin. order issued 6/15/74.	Presently in compliance with terms of order.
Indiana, Brownstown	Kieffer Paper Mill Boilers	Violation of particulate matter emission standard.	Notice of violation issued 10/12/73.	Now on enforceable State schedule.
Indiana Mitchell	Lehigh Cement Co. Kilns	Violation of particulate matter emission standards.	Notice of violation issued 11/26/73. Admin. order issued 1/25/74.	Presently in compliance with terms of order.
Indiana, Richmond	Magaw Construction Inc. Asphalt Plant	Violation of opacity and particulate matter emission standards.	Notice of violation issued 12/19/73.	Presently in compliance
Indiana, Muncie	Magaw Construction Inc. Asphalt Plant	Violation of opacity and particulate matter emission standards.	Notice of violation issued 12/19/73.	Presently in compliance.
Indiana, Mt. Summit	Magaw Construction Inc. Asphalt Plant	Violation of opacity and particulate matter emission standards.	Notice of violation issued 12/19/73.	Presently in compliance.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Indiana, Derby	Mulzer Crushed Stone Company Limeston Quarry	Violation of particulate matter and opacity standards.	Notice of violation issued 2/7/74.	Presently in compliance.
Indiana, Indianapolis	Nat'l Starch & Chem. Corp. Boiler House	Violation of particulate matter and sulfur oxide emission standard.	Notice of violation issued 11/19/73 admin. order issued 2/13/74.	Presently in compliance with terms of order.
Indiana, Gary Vicinity	NIPSCO Power Plant	Violation of sulfur oxide emission standard.	Notice of violation issued 9/13/73.	Administrative order pending Seventh Circuit decision.
Indiana, Indianapolis	Phillips Petro. Company	Violation of hydrocarbon emission standards.	Notice of violation issued 5/30/74.	
Indiana, Terre Haute	Public Service Co. of WABASH Power Plant	Violation of sulfur oxide emission standard.	Notice of violation issued 9/13/73.	Conference scheduled 8/30/74.
Indiana, Indianopolis	RCA Corp. Electronics Manufacturer	Violation of hydrocarbon emission standard.	Notice of violation issued 7/1/74.	

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Indiana, Indianapolis	Rock Island Refining Corp. Oil Refinery	Violation of hydrocarbon and carbon monoxide emission standards.	Notice of violation issued 1/3/74.	
Indiana, Sellersburg	Sellersburg Stone Company Rock Crushing	Violation of opacity and particulate matter emission standards.	Notice of violation issued 1/10/74.	
Indiana, Hammond	Stauffer Chem. Company Sulfuric acid Manufacturer	Violation of sulfur dioxide emission [illegible]	Notice of violation issued 1/10/74.	
Indiana, Laforte	Teledyne Casting Service Cupola	Violaton of particulate matter emission standard.	Notice of violation issued 5/2/74.	Evaluating stack test report.
Indiana, Indianapolis	Union Carbide Corp. Boiler	Violation of particulate matter emission standard.	Notice of violation issued 5/29/74.	
Indiana, Shoals	U.S. Gypsum Plaster Mfg.	Violation of particulate matter emission standard.	Notice of violation issued 10/5/73.	On enforceable State schedule

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
ndiana, Wabash	U. S. Gypsum Co. Mineral wool cupolas	Violation of particulate matter stand-	Notice of violation issued on	On enforceable State
Indiana, Gar	U.S. Steel Corp. Gary Works Steel Mill, Cement Plant	Operation of a steel mill with cement production facilities (Universal Atlas Co.) in violation of opacity and particulate emission standards.	Notice of violation issued 5/18/73. Order issued June 22, 1973.	U. S. Steel requested U.S. District Court, Hammond, Indiana, for a stay of the order and declaratory judgement to void order. EPA counter claimed to to enforce the terms of the order (first increment past due) on 8/15/73. U.S. District Court denied U.S. Steel' motion to stay and will hold hearing on the merits of declatory judgement for these issues not dismissed. Have entered into settlement discussions with U.S. Steel to obviate necessity for hearing on merits.
Indiana Wabash	Wabash Smelting Corp. Alluminum Plant	Violation of opacity standards.	Notice of violation issued 3/28/73. Order issued 5/30/73.	Presently in compliance with terms of the order.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Indiana, [illegible]	Wabash Smelting, Inc. Smelter	Violation of particulate matter and opacity standards.	Notice of violation issued 4/22/74.	Conference held 7/22/74.
Indiana, Terre Haute	Weston Paper and Mfg. Co. Boiler	Violation of particulate matter and sulfuroxide limitations.	Notice of violation issued 11/9/73; order for standard. issued 1/28/74.	Presently in compliance with terms of order. particulate matter only
Indiana, East Chicago	Youngstown Sheet and Tube Co. Steel Mill	Violation of particulate and opacity standards.	Notice of violation issued 7/18/73.	On enforceable State order.
Michigan, Hillsdale	Hillsdale Foundry	Violation of particulate matter emission standard.	Notice of violation issued 4/9/74.	State legal action has been initiated to enforce schedule.
Minnesota, International Falls	Boise Cascade Corp. Kraft, pulp and paper mill.	Violation of particulate matter emission standard.	Notice of violation issued 4/18/74. Consent order issued on 5/20/74.	Presently in compliance with terms of order.
Minnesota, Brainerd	Burlington Northern, Inc. Boilers	Violation of particulate matter emission standard.	Notice of violation issued 2/20/74.	State order issued 6/26/74.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Minnesota, Red Wing	Conwed Corp. Cupola & Blowchambers	Violation of Minn. particulate emission standards.	Notice of violation issued 2/20/74.	On enforceable State order.
Minnesota Collegeville	St. John's U. Boiler	Violation of particulate emission standard.	Notice of violation issued 2/20/74.	Evaluating stack test report
Minnesota, Duluth	U.S. Steel-S. works Coke Ovens	Violation of particulate matter emis-	Notice of violation issued 5/2/74.	
Wisconsin, Mixton	Husky Industries, Inc. Charcoal Mfr.	Violation of particulate matter emission standard.	Notice of violation issued 4/3/74.	State order issued 6/28/74.
Wisconsin, Milwaukee	Pabst Brewing Co. Brewery	Violation of particulate matter emission standard.	Notice of violation issued 4/3/74.	State order issued 6/20/74.
Wisconsin, Milwaukee	Miller Brewing Co. Brewery	Violation of particulate matter emission. Federal compliance schedule for hydrocarbon emission standard.	Notice of violation issued 4/3/74.	
Wisconsin, Milwaukee	Milwaukee Solvay Coke Co. Coke Ovens	Violation of particulate matter opacity and hydrocarbon emission standards.	Notice of violation issued 1/9/74.	State order issued 6/11/74.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
REGION VI				
Louisiana, Dodson	Hunt Lumber Co., Inc. Conical Incinerator	Violaton of opacity particulate matter and open burning regulations.	Notice of violation issued 6/27/74.	

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
REGION VII				
Iowa, Clinton	Clinton Corn Processing Company Grain Dryers	Violation of particulate matter emission standard.	Notice of violation issued 6/3/74.	
Iowa, Ft. Dodge	Georgia Pacific Corp. Wallboard Mfr.	Violation of particulate matter and opacity standards.	Notice of violation issued 7/11/74.	Source presently in compliance with terms of order.
Kansas Kansas City	Erman Corp. Railroad Car Salvage	Violation of open burning regs.	Notice of violation issued 5/3/74.	Open burning ceased.
Missouri, N. Kansas City	ADM Milling Co. Grain Processing	Violation of particulate emission standard.	Notice of violation issued 1/14/74.	On acceptable compliance schedule.
Missouri, Glover	Asarco Primary Lead Smelter	Violation of sulfur-oxide emission standard.	Notice of violation issued 6/2/73. Admin. order issued 10/23/73.	Order has been rescinded mooting present litigation. Awaiting final modeling report from contractor prior to taking administrative action on proposed revision to State Implementat Plan an issuing a new order.
Missouri Affton	Alpha Portland Cement Clinker Cooler	Violation of Mo. particulate matter (process weight regulation.	Notice of violation issued 9/28/73.	On acceptable compliance schedule.
Missouri Hannibal	Board of Public Works Power Plant	Violation of particulate emissions limitation.	Notice of violation issued 1/2/74.	Notice of violation withdrawn 4/25/74. (power plant shutdown).

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Missouri, Columbia	Columbia Water & Light Dept. Boilers	Source did not test boilers 6 & 7 within two month extension given by Regional Office as required in Section 114 letter.	Admin. order issued 8/8/73.	Plan to test boilers 1, 2, 4 & 5 latter part of July, 1974. Boilers 6 & 7 in compliance.
Missouri, Louisiana	Hercules, Inc. Fertilizer Manufacturer	In violation of particulate matter emissions standard.	Notice of violation issued 5/16/73. Order 10/15/73.	Presently in compliance with terms of order.
Missouri, Lebanon	Independent Stave Co., Inc. Boilers, Cyclones	Violation of particulate matter (process emissions) and opacity standards.	Notice of violation issued 7/9/73. Supplemental notice of violation issued 10/10/73.	Scheduled to be arraigned in fall, 1974.
Missouri, Hannibal	Marion County Milling Alfalfa Dehydrating.	Violation of opacity standard.	Notice of violation issued 6/16/74.	State is negotiating compliance schedule with source.
Missouri, Parkville	Mid-Continent Asphalt and Paving Co. Asphalt Mfr.	Violation of opacity standard.	Notice of violation issued 10/19/73.	Issued Administrative order 4/25/74, Plan to refer to Attorney for civil action.
Missouri, St. Louis County	Union Electric Co. Labadie Station Power Plants	Violation of sulfur-oxide emission limitation.	Notice of violation issued May 31, 1974. Conference requested by Union Electric Co. on 6/7/74.	Conference scheduled for 8/5/74.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Missouri, St. Louis County	Union Electric Co. Meramec Station Power Plants	Violation of sulfur-oxide emission limitation.	Notice of violation issued May 31, 1974. Conference requested by Union Electric Co. on 6/7/74.	Conference scheduled for 8/5/74.
Missouri, St. Louis County	Union Electric Co. Sioux Station Power Plants	Violation of sulfur-oxide emission limitation.	Notice of violation issued May 31, Conference requested by Union Electric Co. on 6/7/74.	Conference scheduled for 8/5/74.
Missouri, Bonne Terre	Valley Mineral Prod. Corp. Rock Crushing	Violation of Mo. process weight and visible emissions regulations.	Notice of violation issued 1/14/74.	On acceptable State compliance schedule.
Nebraska, Beatrice	Dempster Industries, Inc. Cupola	Violation of Federal particulate matter emission standard.	Administrative order issued 7/2/74.	
Nebraska, Bellevue	Nebraska Public Power Framer Station Power Plant	Violation of emission limitations for particulates.	Notice of violation issued 2/4/74.	Administrative order issued 3/14/74.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
REGION VIII				
Colorado, Pueblo	CF&I Steel Corp. Steel Mill	Violation of opacity standard.	Notices of violation issued 5/8,15, 17 and 6/6/74.	Conference held 7/2/74; Battery E closed.
Utah, Woods Cross	Crown Refining Co. Petroleum Refinery	Violation of new source review.	Notice of violation issued 5/6/74. Order issued 7/26/74.	Complying with order Plant production unit closed.
Utah, Salt Lake City	Granite Mill and Fixture Co.	Violation of opacity standard.	Notice of violation issued 6/27/74.	
Utah, Woods Cross	Lloyd A. Fry Roofing Co. Roofing Mfr.	Violation of opacity standard.	Notice of violation issued 1/23/74.	Delayed pending State litigation.
Utah, Salt Lake City	Utah Sand & Gravel Rock Crushing.	Violation of opacity standard.	Notice of violation issued 6/20/74.	Conference held 8/7/74.
Wyoming, Sundance	Roberts Construction Company Quarry and Crushing Operation	Violation of ambient air standard for total suspended particulates as provided in Wyoming SIP.	Notice of violation issued 8/16/73. Order issued 9/28/73.	Presently in compliance with terms of order.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
REGION IX				
Arizona Benson	Apache Powder Co. Nitric acid plant and open burning.	Violation of opacity open burning, and nitrogen oxide emission standards.	Notice of violation issued 11/13/73.	Presently in compliance.
Arizona, Payson	Kaibab Industries Incinerators	Violation of opacity standards.	Notice of violation issued 7/24/73. Admin. order issued 9/26/73.	Presently in compliance with terms of order
Arizona, Douglas	Phelps Dodge Corp. Copper Smelter	Violation of opacity particulate matter emission standards.	Notice of violation issued 3/27/74; admin. order issued 6/6/74.	
Arizona, Page	Salt River Najaho Plant Power Plant	Violation of Federally promulgated compliance schedule for particulate matter.	Notice of violation issued 6/10/74.	Order being prepared
Arizona, Snowflake	Western Moulding Co. Inc. Incinerators	Violation of opacity standards.	Notice of violation issued 7/24/73.	On State compliance schedule

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Arizona Snowflake	Western Pine Industries Incinerators	Violation of opacity standards.	Notice of violation issued 7/24/73.	On State compliance schedule.
California, North Hollywood	ALCO Gravure Printing Co.	Violation of Hydrocarbon emission standard.	Notice of violation issued 4/26/74.	APCD to accept enforceable compliance schedule
California, Richmond	Allied Chem. Corp. Chemical Mfr.	Violation of sulfur oxide emission standard.	Notice of violation issued 7/18/74.	
California, Brawley	Batley-Janss Enterprise Alfalfa Mill	Violation of particulate and opacity emission standards.	Notice of violation issued 12/14/73	In compliance (source shutdown).
California, Cloverdale	Cloverdale Plywood Co.(Fibreboard Corp.) Incinerator	Violation of opacity standards.	Notice of violation issued 8/10/73. Admin. order issued 12/21/73.	Presently in compliance with terms of order.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
California, Long Beach	Dept. of Water & Power Power Plant	Violation of nitrogen oxide emission	Consent order issued 7/9/74.	Presently in compliance with terms of order.
California, Vernon	Fibreboard Corp. Incinerator	Violation of opacity standard.	Notice of violation issued 3/11/74. Admin. order issued 12/21/73.	Achieved final compliance 7/8/74.
California, Cloverdale	C&B Lumber Co Incinerator	Violation of opacity standards.	Notice of violation issued 8/10/73. Admin. order issued 12/20/73.	Presently in compliance with terms of order.
California, South Gate	Gen. Motors Corp Organic Solvent	Failure to submit a proposed compliance with hydrocarbon emission standards.	Consent order issued 6/3/74.	Presently complying with terms of order.
California Fort Bragg	Georgia Pacific Corp. Incinerator	Violation of opacity standard.	Notice of violation issued 8/10/73. Admin. order issued 12/2/73.	
California, Los Angeles	Gravure W. Printing Co. Organic Solvents	Violation of increments of progress of schedule to meet hydrocarbon emission standard.	Notice of violation issued 5/10/74.	APCD to adopt enforceable compliance schedule.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Fontana	Kaiser Steel Corp. Steel Mill	Violation of opacity, sulfur oxide emission standards.	Notice of violation issued 8/7/73; consent order issued 6/11/74.	Presently in compliance with terms of order.
California, Covelo	Louisiana Pacific Corp. Incinerator	Violation of opacity standard.	Notice of violation issued 8/10/73 Admin. orders issued 12/20/73.	Achieved compliance 5/1/74.
California Fort Bragg	Louisiana Pacific Co. Incinerator	Violation of opacity standard.	Notice of violation issued 8/10/73. Admin. order issued 12/20/73.	Achieved final compliance 5/14/74.
California, Calpella	Masonite Corp., Incinerator	Violation of opacity standards	Notice of violation issued 8/10/73. Admin. orders issued 12/20/74.	Achieved final compliance 6/1/74.
California, Cloverdale	Masonite Corp. Incinerator	Violation of opacity standard.	Notice of violation issued 8/10/73. Admin. order issued 12/20/73.	Achieved final compliance 6/27/74.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
California, Monolith,	Monolith Portland Cement Plant Cement Kilns	Violation of opacity and particulate emission standards.	Notice of violation issued 11/20/73; admin. order issued 5/10/74.	Presently in compliance with terms of order.
California, Martinez	Monsanto-Avon Plant Boilers.	Violation of sulfur oxide emission std.	Notice of violation issued 7/18/74.	
California, Martinez	Phillips Petro. Co. Avon Plant	Violation of sulfur oxide emission std.	Notice of violation issued 7/18/74.	
California, Ukiah	Redwood Coast Lumber Co. Incinerator	Violation of opacity standard reg.	Notice of violation issued 12/20/73.	Achieved final compliance 7/8/74.
California, Anderson	Simpson Lee Paper Co. Boiler	Violation of opacity particulate and sulfuroxide (TRS) emission standard.	Notice of violation issued 3/21/74. Admin. order issued 4/9/74.	Presently in compliance with terms of order.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
California, Richmond	Standard Oil of Calif. Refinery	Violation of sulfur oxide emission standard.	Notice of violation issued 7/18/74.	
California, El Segundo	Standard Oil of Calif. Oil Refinery	Violation of Calif. review of new sources and modifications regs.	Notice of violation issued 1/31/74. Admin. order issued 3/5/74.	Presently in compliance with terms of order.
California, Carson	Texaco, Inc. Sulfur Recovery Plant	Violation of sulfur oxide emission standards.	Notice of violation issued 2/22/74; admin. order issued 5/9/74.	Presently complying with terms of order.
California, Los Angeles	Uniroyal, Inc. Rubber Mfr.	Failure to submit approvable compliance schedule pursuant to Federally promulgated regulation.	Notice of violation issued 3/11/74; consent order issued 6/18/74.	
Hawaii Halaula	Kohala Corp. Sugar Mill Boiler	Violation of opacity and particulate matter emission standards.	Consent order issued 7/16/74.	

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Nevada, Gabbs	Basic Industries Quarry Mill	Violation of particulate opacity emission standards.	Notice of violation issued 5/2/74.	
Nevada, S. Calif.	S. Calif. Edison Power Plant	Violation of opacity and sulfur oxide emission standards.	Notice of violation issued 7/25/73; order issued 11/1/73.	Presently in compliance with terms of order

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
REGION X				
Idaho, Pocatello	FMC Corp. Phosphurus Mfg.	Violation of particulate emissions standard.	Notice of violation issued 3/8/74.	Presently in compliance.
Idaho, Lewiston	Potlatch Corp. Kraft Pulp Mill	Violation of opacity standard.	Administrative order issued 4/8/74.	Presently in compliance with terms of order.
Idaho, Lewiston	Potlatch Corp. Pulp Mill Boilers	Violation of particulate emission standards.	Notice of violation issued 2/8/74.	Conference held 3/4/74.
Washington, Connell	Connell, City of dump	Violation of open burning regs.	Notice of violation issued 9/21/73. Admin. order issued 12/12/73.	Amended order under consideration.
Washington, Dayton	Dayton, City of dump	Violation of open burning regs.	Notice of violation issued 9/21/73. Admin. order issued 12/12/73.	Presently complys with order.
Washington, Lamont	Lamont, City of dump	Violation of open burning regs.	Notice of violation issued 9/21/73. Admin. issued 12/12/73.	Presently complying with order.

STATE/CITY	COMPANY/TYPE OF SOURCE	POLLUTION PROBLEM	TYPE OF ACTION	RESULTS/STATUS
Washington, Long Beach	Peninsula Sanitation Service Disposal Service	Violation of open burning regs.	Notice of violation issued 10/17/73.	Presently in compliance.
Washington, Oaksdale	Oaksdale, City of dump	Violation of open burning regs.	Notice of violation issued 9/21/73. Admin. order issued 12/12/73.	Presently complies with order.
Washington, Whitman	Whitman County dump	Violation of open burning regs.	Notice of violation issued 9/21/73. Admin. order issued 12/12/73.	In violation of order, civil/criminal action contemplated.

SECTION 6 — AIR QUALITY AND EMISSION DATA

AMBIENT AIR QUALITY

Table 6-1 lists, by State, the level of monitoring activity for calendar year 1973 being reported to EPA's National Aerometric Data Bank (NADB) as of July 5, 1974 (170 days after the end of the fourth quarter). Under each pollutant, the initial column shows the number of individual stations required in the August 14, 1971, Federal Register, the second shows the number of stations for which data collected in 1972 have been reported and the third column the number of stations for which data were collected in 1973.

Note that some States in Table 6-1 are reporting as many stations as required, and some are reporting more; but these stations are not always distributed among the Air Quality Control Regions in accord with minimum requirements for each AQCR. Consequently, even in these States, one or more AQCRs may not yet satisfy minimum monitoring requirements.

Tables 6-2 through 6-5[1] summarize the status of air quality in the nation's 247 AQCRs as portrayed by the data reported to NADB for CY 1973. For each pollutant, the number of AQCRs in each priority classification is shown, plus the number of AQCRs reporting (1) at least one station-quarter of data, and (2) at least one valid station-year of data for particulates and sulfur dioxide, to which annual standards pertain. The final column in each of these tables reports the number of AQCRs wherein one or more reporting stations exceeded a primary standard.

STATUS OF PRIORITY CLASSIFICATIONS IN RELATION TO STANDARDS

The suspended particulate annual primary standard was exceeded in over half of the Priority I and Ia AQCRs (94 out of 120) in 1973, and

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Table 6-1. STATUS OF CY 72 AND 73 MONITORING ACTIVITY AS REPORTED TO NADB BY STATES[a,b]

EPA Region/State	AQCRs within state	Total suspended particulates			Sulfur dioxide			Carbon monoxide			Oxidants		
		Minimum required[c]	Total reporting 1972	Total reporting 1973	Minimum required[c]	Total reporting 1972	Total reporting 1973	Minimum required[c]	Total reporting 1972	Total reporting 1973	Minimum required[c]	Total reporting 1972	Total reporting 1973
Region I													
Connecticut	4	16	25	57	14	4	30	4	0	1	4	0	2
Maine	5	13	6	16	13	9	19	0	0	0	0	0	0
Massachusetts	6	39	52	46	34	48	50	7	2	0	7	0	0
New Hampshire	3	8	25	33	9	4	10	0	0	1	0	0	2
Rhode Island	1	7	23	27	7	20	25	0	2	3	0	0	0
Vermont	2	4	2	7	5	0	0	0	0	0	0	0	0
Region II													
New Jersey	4	19	78	78	20	28	30	8	20	22	7	3	9
New York	8	72	228	289	58	49	101	13	10	16	19	7	16
Puerto Rico	1	3	5	5	4	4	4	0	0	0	0	0	0
Virgin Islands	1	3	4	3	4	2	3	0	0	0	0	0	0
Region III													
Delaware	2	3	16	18	3	10	8	1	0	0	1	0	0
Dist of Columbia	1	4	2	2	4	4	2	1	2	0	1	1	0
Maryland	6	31	85	81	29	50	67	6	1	15	6	0	8
Pennsylvania	6	68	105	128	42	14	22	11	1	3	11	1	1
Virginia	7	47	116	170	16	44	79	2	3	6	7	3	8
West Virginia	10	24	36	36	12	14	11	0	1	0	0	0	0
Region IV													
Alabama	7	34	60	76	15	10	13	3	0	1	4	1	2
Florida	6	32	39	59	24	36	24	0	3	0	4	2	4
Georgia	9	43	29	47	36	14	26	0	1	1	1	0	0
Kentucky	9	30	88	116	18	78	122	0	4	8	3	2	4
Mississippi	4	11	1	28	9	2	16	0	0	0	2	0	1
North Carolina	8	54	178	166	11	135	132	0	0	1	2	1	3
South Carolina	10	35	72	77	19	36	56	0	0	1	1	0	2
Tennessee	6	39	95	98	17	34	52	0	1	0	5	2	2
Region V													
Illinois	11	54	54	55	52	38	53	10	0	7	10	1	2
Indiana	10	42	117	92	37	61	69	4	0	1	4	1	1
Michigan	6	29	108	123	27	42	53	0	0	7	0	0	1
Minnesota	7	25	57	82	23	18	41	4	2	4	0	1	2
Ohio	14	78	123	227	60	72	92	0	4	4	16	7	7
Wisconsin	8	24	7	71	9	3	33	0	0	4	4	0	4

Table 6-1 (continued). STATUS OF CY 72 AND 73 MONITORING ACTIVITY AS REPORTED TO NADB BY STATES[a,b]

EPA Region/State	AQCRs within state	Total suspended particulates			Sulfur dioxide			Carbon monoxide			Oxidants		
		Minimum required[c]	Total reporting 1972	Total reporting 1973	Minimum required[c]	Total reporting 1972	Total reporting 1973	Minimum required[c]	Total reporting 1972	Total reporting 1973	Minimum required[c]	Total reporting 1972	Total reporting 1973
Region VI													
Arkansas	7	10	28	52	4	2	11	0	0	0	0	0	0
Louisiana	3	5	11	11	15	17	18	0	0	0	5	4	2
New Mexico	8	16	26	48	9	5	26	1	1	2	3	1	1
Oklahoma	8	24	90	90	6	25	27	0	2	4	4	2	2
Texas	12	52	160	203	49	13	101	1	0	0	19	0	7
Region VII													
Iowa	12	32	26	46	13	2	21	0	0	1	2	0	0
Kansas	7	35	57	61	6	31	49	1	3	9	3	2	5
Missouri	5	30	46	73	15	4	23	6	1	8	6	1	9
Nebraska	4	11	36	43	5	2	3	0	1	1	0	1	1
Region VIII													
Colorado	8	28	68	73	8	3	8	3	1	6	3	2	5
Montana	5	13	2	22	14	1	8	0	0	0	0	0	0
North Dakota	2	5	16	16	2	0	0	0	0	0	0	0	0
South Dakota	4	6	2	8	3	1	1	0	0	0	0	0	0
Utah	3	11	8	8	9	1	11	2	4	4	2	0	3
Wyoming	3	7	3	13	3	1	5	0	0	1	0	0	0
Region IX													
American Samoa	1	1	0	0	1	0	0	0	0	0	0	0	0
Arizona	4	17	32	47	16	15	37	3	1	3	3	2	2
California	11	64	18	67	17	15	43	29	42	61	29	60	76
Guam	1	1	3	5	4	2	2	0	0	0	0	0	0
Hawaii	1	3	14	16	1	12	12	0	1	1	0	1	1
Nevada	3	13	41	40	8	3	9	2	0	1	2	1	2
Region X													
Alaska	4	11	17	28	7	7	4	1	1	2	0	0	0
Idaho	4	15	25	24	7	0	6	0	0	0	0	0	0
Oregon	5	20	48	17	8	2	12	3	2	5	3	2	4
Washington	6	31	54	44	14	12	19	7	8	8	5	4	5
Total		1352	2667	3368	875	1059	1699	133	125	223	208	116	206

a CY 72 data are as reported by September 3, 1973 (i.e. end of reporting period + 240 days). CY 73 data are as reported by June 30, 1974 (i.e. end of reporting period + 70 days).

b CY 72 and CY 73 data represent any valid quarter of data.

c Federal Register. Volume 36, No. 156. August 14, 1971 p 15488

that count could be higher considering only 92 of the 120 Priority I and Ia AQCRs had reported a complete year's data for at least one station as of June 1974 (Table 6-2). Two-thirds of the Priority I and Ia AQCRs exceeded the 24-hour particulate primary standard (83 out of 120), with 118 out of 120 Priority I and Ia AQCRs reporting at least one quarter's data with which to appraise their status with respect to the 24-hour particulate standards.

Table 6-2. SUSPENDED PARTICULATE MATTER, STATUS OF AIR QUALITY, 1973

Priority classification	Number of AQCRs	AQCRs reporting		AQCRs exceeding any primary standard
		At least 1 station-quarter	At least 1 station-year	
I-Ia	120	118	92	94
II	70	66	50	31
III	57	41	30	18
Total	247	225	172	143

Sulfur dioxide continues to appear the most successfully controlled pollutant, with only 10 AQCRs (8 Priority I and Ia; and 2 Priority II) reporting stations exceeding the annual standard. However, only approximately half the AQCRs in these two priority classes have reported valid annual data for 1973 (Table 6-3).

Table 6-3. SULFUR DIOXIDE, STATUS OF AIR QUALITY, 1973

Priority classification	Number of AQCRs	AQCRs reporting		AQCRs exceeding any primary standard
		At least 1 station-quarter	At least 1 station-year	
I-Ia	60	55	33	17
II	41	35	24	6
III	146	97	43	4
Total	247	187	100	27

Carbon monoxide is pervasive. Of the 30 Priority I and Ia AQCRs, 26 reported at least one quarter's data, and 25 exceeded the 1-hour or (more often) the 8-hour standard (Table 6-4). The 26th AQCR only reported the equivalent of 4 month's data, mostly in the first half of the year. Of particular significance is the fact that of the 217 Priority III AQCRs, which are not required to monitor for carbon monoxide, 34 have established monitors and submitted data, and 28 report at least one site where a carbon monoxide standard is being exceeded.

Table 6-4. CARBON MONOXIDE, STATUS OF AIR QUALITY, 1973

Priority classification	Number of AQCRs	AQCRs reporting at least 1 station-quarter	AQCRs exceeding 8-hr primary standard
I-Ia	30	26	25
III	217	34	28
Total	247	60	53

Oxidant values (Table 6-5) are exceeding the 1-hour standard in almost every Priority I and Ia AQCR reporting (40 out of 41) and in three-fourths of the Priority III AQCRs reporting (12 out of 16).

Table 6-5. OXIDANTS, STATUS OF AIR QUALITY, 1973

Priority classification	Number of AQCRs	AQCRs reporting at least 1 station-quarter	AQCRs exceeding primary standard
I-Ia	55	41	40
III	192	16	12
Total	247	57	52

Nitrogen dioxide priority classifications have been substantially revised from the initial classifications; there are now 5 Priority I's, the remainder are Priority III. Of the 5, only 2 reported a full year's data, and both exceeded the annual standard. None of the 18 Priority III AQCRs reporting a full year's data exceeded the standard. These results remain tentative until a reference method is selected and the equivalency of the remaining methods is appraised.

The presence of individual values or annual means over the standards clearly identifies problem AQCRs. The absence of such values or means in the data reported from other AQCRs does not necessarily warrant the conclusion that the standards are being met in those AQCRs until their monitoring networks have been thoroughly appraised for adequacy in number and placement of monitoring sites. Many AQCRs do not have comprehensive networks operating; others are only just beginning to report scattered results from the initial stages of network implementation. Until assessments can be made of network adequacy, a technical distinction exists in describing an AQCR reporting no values above standards. For the present, it can only be stated that such an AQCR "reports no violation." The goal, based on data from an adequate network, will be to designate such an AQCR as "in compliance" with national ambient air quality standards. The presence of individual values or annual means above standards is a particular problem in Priority II and III AQCRs. The Plan Revision Management System, discussed in Section 4, helps to identify such problem areas and to single them out for further investigation.

In some instances, the lack of stations in an AQCR may be only an apparent deficiency. Stations may exist for which the data are not yet being expeditiously relayed or correctly identified for acceptance in the NADB.

TIMELINESS AND AVAILABILITY OF DATA

Tables 6-6 through 6-9 show the percentage of air quality data received by EPA at 75, 105, 135, and 170 days after the end of the quarterly reporting period. There has been a significant increase in the amount of data received for each of the quarterly reports, beginning with second quarter 1973 through the first quarter of 1974, with the exception of carbon monoxide and oxidant data for the first quarter of 1974.

Table 6-6. COMPARISON OF QUARTERLY DATA AVAILABLE FOR PARTICULATE MATTER, II-CY-73 TO I-CY-74

Calendar quarter and year	Percent of sites reporting data			
	End of quarter + 75 days	End of quarter + 105 days	End of quarter + 135 days	End of quarter + 170 days
II - 1973	0	10.9	10.9	10.9
III - 1973	0	35.7	42.4	48.9
IV - 1973	0	40.2	54.7	66.6
I - 1974	9.1	56.3	--	--

Table 6-7. COMPARISON OF QUARTERLY DATA AVAILABLE FOR SULFUR DIOXIDE, II-CY-73 TO I-CY-74

Calendar quarter and year	Percent of sites reporting data			
	End of quarter + 75 days	End of quarter + 105 days	End of quarter + 135 days	End of quarter + 170 days
II - 1973	0	11	11	11
III - 1973	0	41.8	47.6	53.4
IV - 1973	0	43.8	50.9	62.8
I - 1974	9.8	64.7	--	--

Table 6-8. COMPARISON OF QUARTERLY DATA AVAILABLE FOR OXIDANTS, II-CY-73 TO I-CY-74

Calendar quarter and year	Percent of sites reporting data			
	End of quarter + 75 days	End of quarter + 105 days	End of quarter + 135 days	End of quarter + 170 days
II - 1973	0	1.7	1.7	1.7
III - 1973	0	9	14.9	19.8
IV - 1973	0	40.3	48.3	67.2
I - 1974	1.5	26.7	--	--

Table 6-9. COMPARISON OF QUARTERLY DATA AVAILABLE FOR CARBON MONOXIDE, II-CY-73 TO I-CY-74

Calendar quarter and year	Percent of sites reporting data			
	End of quarter + 75 days	End of quarter + 105 days	End of quarter + 135 days	End of quarter + 170 days
II - 1973	0	3.9	3.9	3.9
III - 1973	0	12.6	22.9	33.8
IV - 1973	0	51.1	59.1	71.8
I - 1974	12.7	36.5	--	--

Table 6-10 shows the status of semiannual emissions reporting since CY 1972. Timely submission of emission data remains a problem. Over the last three semiannual report periods, about half of the States have provided EPA with adequate emission data. Increased emphasis is being placed by EPA to resolve data input problems in the remaining States.

Table 6-10. STATES SUBMITTING SEMIANNUAL REPORTS

EPA Region	States required	Report period III, IV CY 72	Report period I, II CY 73	Report period III, IV CY 73
I	6	4	3	0
II	4[a]	0	0	0
III	6[b]	1	1	3
IV	8	8	6	0
V	6	1	1	1
VI	5	4	4	0
VII	4	4	4	3
VIII	6	5	5	4
IX	6[c]	3	3	1
X	4	3	0	2
Total	55	33	27	14

[a] Includes Puerto Rico and Virgin Islands.
[b] Includes District of Columbia.
[c] Includes Guam and American Samoa.

SYSTEMS IMPROVEMENT TO SAROAD/NEDS

Plans and procedures have been developed to assure the integrity of the data contained in the National Emissions Data System (NEDS) and the Storage and Retrieval of Aerometric Data (SAROAD) system. Data in both systems are used for a wide variety of purposes and are essential to basic decisions concerning attainment of standards and evaluation of

strategies. The newly developed Data Auditing System contains a series of computerized routines to edit and validate data. It flags erroneous or suspect data for verification and/or correction.

COMPREHENSIVE DATA HANDLING SYSTEM

The Air Quality Data Handling Subsystem (AQDHS II),[2] a portion of the Comprehensive Data Handling System (CDHS), was developed for use by State and local agencies to improve their report generating and data handling capabilities. Resources have been allocated by EPA to install this data system in several control agencies. The AQDHS II is compatible with SAROAD.

The Emissions Inventory Subsystem (EIS),[3,4] another element of the Comprehensive Data Handling System, provides the same general assistance to States in improving the data handling activities associated with emissions information. The EIS is compatible with NEDS.

REFERENCES FOR SECTION 6

1. Monitoring and Air Quality Trends, 1973. U.S. Environmental Protection Agency. Research Triangle Park, North Carolina. In preparation.

2. Comprehensive Data Handling System, Air Quality Data Handling Subsystem (AQDHS-II) Program Documentation and User's Guide. U.S. Environmental Protection Agency. Research Triangle Park, North Carolina. EPA-450/3-74-045. July 1974.

3. Comprehensive Data Handling System, Emissions Inventory Subsystem (EIS), User's Guide. U.S. Environmental Protection Agency, Research Triangle Park, North Carolina. Publication No. APTD-1550. July 1973.

4. Comprehensive Data Handling System, Emissions Inventory Subsystem (EIS), Program Documentation. U.S. Environmental Protection Agency, Research Triangle Park, North Carolina. Publication No. APTD-1551. July 1973.

SECTION 7 — CONTROL AGENCY RESOURCES

During FY 1974, State and local air pollution control agencies reported 7805 budgeted positions; 7236 of these positions are filled. The 7236 filled postions reflect a level of effort of approximately 6500 man-years, which is nearly 1200 man-years less than the original estimates for SIP achievement in 1975 and approximately 3000 man-years less than the SIP estimates anticipated in necessary revisions to the plans. The revised estimates, which call for 9500 man-years in 1975 and 10,200 man-years in 1977, were submitted by the Regional Offices in December 1973. The 1975 estimates appeared in the last progress report.[1]

State and local control agencies spent an estimated $126.1 million on control activities. The Federal Government provided $48.5 million of this amount through Federal program grant assistance. In addition, the agencies received, as part of the Federal grant assistance, approximately $1.1 million to support Federal assignees and $2.8 million in special support and demonstration grant assistance. The special support helps the State and local agencies accomplish tasks associated with meeting imposed deadlines for the submittal and modification of implementation plans and for meeting other Federal requirements.

The resource estimates made in December 1973 increased expected needs over the original SIP estimates by 30 percent for funds and by 10 percent for manpower. The reassessment accounted for program demands anticipated in the land use and transportation areas, for indirect source reviews, and for expected significant deterioration activities. However, these reassessments may be low in States where revisions to control plans must be made to attain standards, where air quality maintenance plans must be developed and implemented, and where implementation of Federal

programs such as enforcement of new source performance standards will be carried out. In addition, the involvement of States in the Federal Energy Act policies concerning air pollution control strategies and the recently promulgated regulation on EPA's nonsignificant deterioration policy may also result in the States making an additional upward reassessment of their resource needs.

Figure 7-1 compares the actual growth of agency manpower with estimated levels (original and revised for SIP achievement, as well as with estimates derived from a manpower model). At the end of FY 1974, the agencies had available approximately 70 percent of the manpower stated as needed by 1975 to accomplish the basic SIPs and revisions to those SIPs. However, approximately two-fifths of the States did not expend in 1974 a man-year effort equivalent to 60 percent of their stated needs.

Figure 7-2 compares actual State and local program funds to estimates of SIP needs - original and revised - and to estimates based on program costs commensurate with the manpower model. The anticipated 1975 and 1977 expenditures for accomplishment of the basic SIP and anticipated revisions are approximately $188 million and $210 million, respectively. In 1974, the agencies had available approximately 69 percent of the funds stated as needed by 1975. Approximately one-third of the States spent less than 60 percent of their stated revised 1975 needs.

Significant increases were made in agency resources in FY 1974. Funding increased by approximately 13 percent ($15 million) and man-years of effort by 15 percent (850 man-years). State and local funds increased by 21 percent over 1973, while available Federal funds increased by only 4 percent. Continued increases at this rate, however, will not permit the stated revised SIP needs to be met in 1975 and, if continued at the same rate of growth, would not achieve the expected 1975 needs until FY 1978.

REFERENCE FOR SECTION 7

1. State Air Pollution Implementation Plan Progress Report, June 30 to December 31, 1973. U.S. Environmental Protection Agency. Research Triangle Park, North Carolina. EPA-450/2-74-004. April 1974.

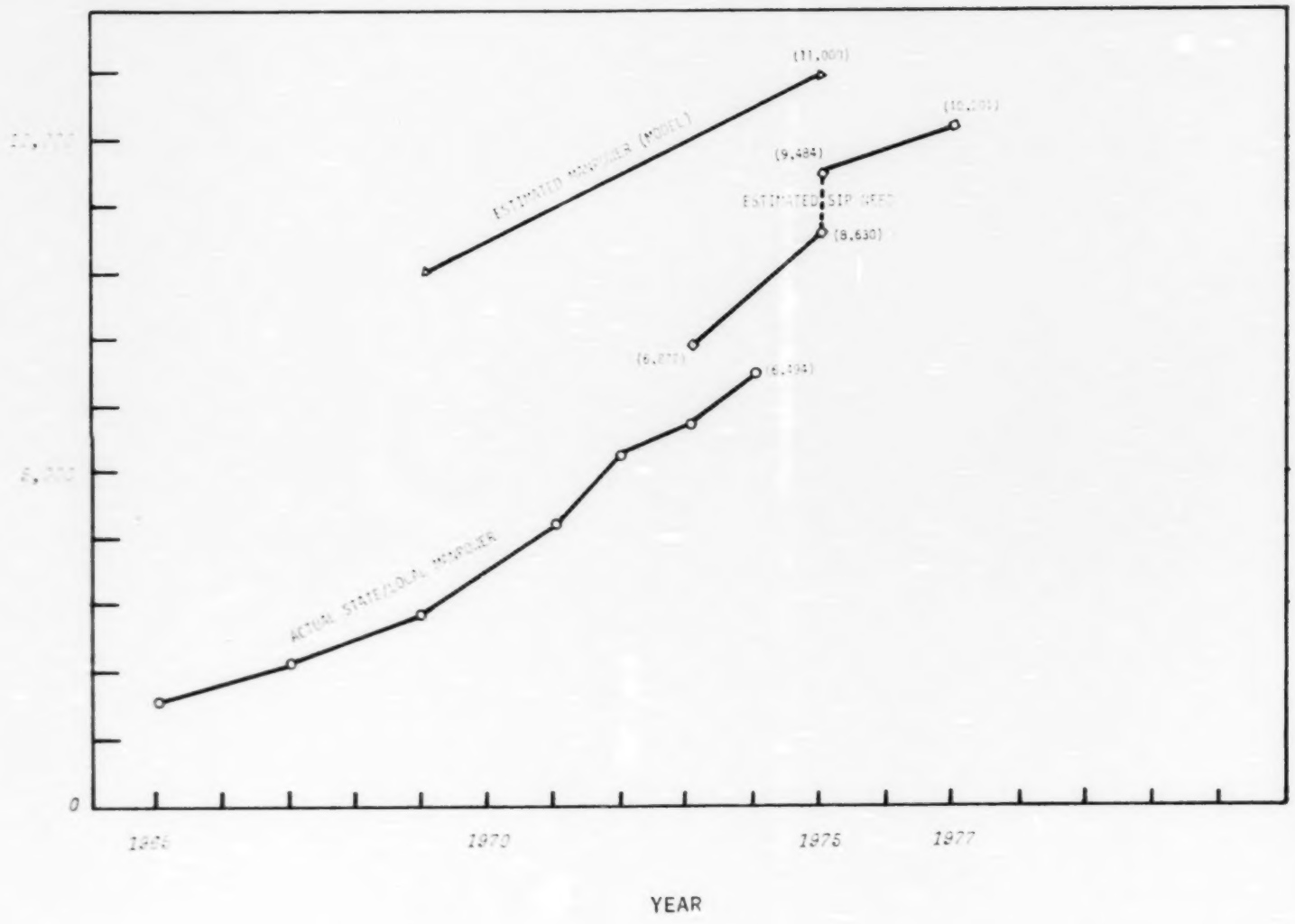

Figure 7-1. Comparison of actual and needed State and local air pollution control program manpower.

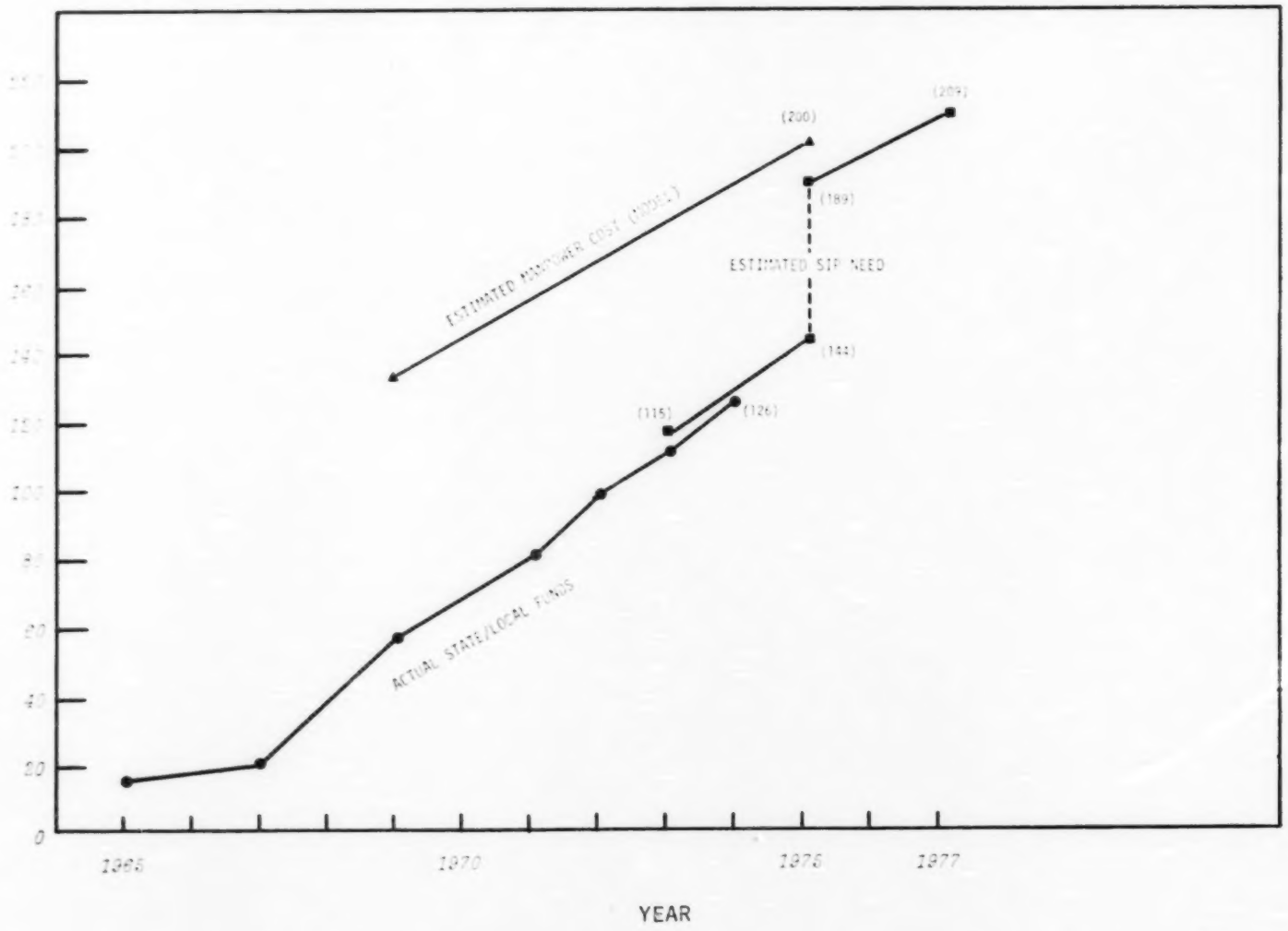

Figure 7-2. Comparison of actual and needed State and local air pollution control program funds.